

REDACTED VERSION

ENHANCED CORPORATE AND OPERATIONAL HISTORY REPORT
WILCOX OIL SUPERFUND SITE

Bristow, Creek County, Oklahoma

Prepared for
U. S. EPA, Region 6
1445 Ross Avenue
Dallas, Texas 75202

Contract No. EP-W-10-011
Task Order No. 10
Work Order No. 006



Prepared by
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1445 Ross Avenue
Dallas, Texas 75202

March 16, 2015

ENFORCEMENT CONFIDENTIAL

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Task Order No.:	10
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Site No.:	06GG
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1.0 INTRODUCTION

The Wilcox Oil site, located on the east side of the Town of Bristow in Creek County, Oklahoma, is a consolidation of two adjacent refineries, Lorraine to the west and Wilcox Oil to the east. The operational history at the two facilities spanned approximately 1915 to 1967. Wilcox Oil Company purchased the Lorraine Refinery property and operations in 1937 to form the consolidated site, which consisted of several production and storage areas, including a tank farm. The site has wide-spread areas of concern related to the raw materials, products and wastes from the former refinery operations and related petroleum storage areas.

Previous research conducted by Toeroek Associates, Inc. (Toeroek) for the U.S. Environmental Protection Agency (EPA) on this site resulted in the Draft Title Search Report delivered on April 8, 2014, and the Draft Title Search and Corporate History Report delivered on May 16, 2014.

1.1 Scope of Work

On December 9, 2014, Toeroek received Work Request Form (WRF) 006 under Task Order 10 from EPA, Region 6, to conduct and report on in depth corporate research for several EPA-specified entities chosen from the 30 companies previously researched by Toeroek. These companies are presumed viable successors to entities identified as potentially responsible parties (PRPs) to the site, and were sent 104(e) Special Notice Letters by the EPA in June 2014.

The WRF also stipulated that certified copies be obtained for the title and court documents cited in the Draft Title Search Report previously submitted. The list of documents obtained is included in Table 1, Certified Title and Court Documents. Certified copies of corporate documents previously obtained for the designated entities were also requested. The list of these documents is included on Table 2, Certified Corporate Documents.

1.2 Research Sources

Through meetings with EPA, it was determined that this deliverable would consist of individual in depth summary reports in table format plus graphic corporate trees for each identified entity and also an operational history section for the site developed from sources available locally and through internet research. Travel was not authorized for this research. A detailed list of other references reviewed for this report is included as Table 3, Summary of Operational History Resources and Results. A general list is provided below:

- Secretary of State websites for Delaware, Indiana, Maine, Missouri, Ohio, Pennsylvania, and Texas
- Securities and Exchange Commission website
- Creek County Recorder's Office
- Creek County Assessor's Office website

- District Court for Creek County, Oklahoma
- Environmental Data Resources
- U.S. Geological Survey
- Natural Resources Conservation Service
- Prior EPA reports located in SEMS
- Moody's Manuals
- Petroleum trade journals
- Newspapers local to the site
- Historical societies local to the site
- Oklahoma Corporation Commission (Oil and Gas Conservation Division)

1.3 Report Format

This report contains four sections. Section 1.0 describes the scope of work, lists the resources used and outlines the sections of the report. Section 2.0 provides operational history information about the site. Section 3.0 provides enhanced corporate histories for business entities contacted by EPA through Special Notice Letters. Section 4.0 summarizes the report and provides conclusions and recommendations.

The report includes two appendices. Appendix A contains three tables. Each table entry includes a reference number with page number tying it to its source document. Reference citations are also included in the report text at the end of each paragraph linking the information to the source documents.

References are distinguished by document type followed by sequential numbers:

- TITLE (Certified title documents and related certified court documents);
- SOS (Certified corporate documents from various secretary of state offices);
- SEC (Certified documents from the Security and Exchange);
- OPS (Material related to site operations);
- INT (Information from the internet);
- SNL (Special Notice Letters sent to some PRPS and their responses);
- SEMS (EPA records available in the Superfund Enterprise Management System)

Appendix B is a list of all referenced documents. A complete set of certified documents accompanies the report.

2.0 OPERATIONAL HISTORY RESEARCH

Numerous sources and potential sources were perused for information on the operations of the on-site refineries and tank farms. These included: federal, state, and county agencies; newspaper and trade magazines; historic maps, aerial photographs, and directories from private research companies; public library reference sections; historical societies; and other internet research. Information from the more fruitful sources is summarized below.

2.1 Sanborn Maps

Sanborn maps, developed by the insurance industry, often contain detailed information on buildings, fuel tanks, other structures, roads, railroads. They often include details of building use, construction, and the name of the occupying business. Sanborn maps are available for areas of interest to the insurance industry from 1867 to the present and can provide dated property use. Sanborn maps showing at least part of the site were obtained for the years 1915, 1920, 1923, and 1961 (OPS-010).

The 1915 Sanborn map has an inset that shows the Continental Refining Co. oil refinery. The only locators are an east-west street bounding the refinery on the north labeled merely "public road" and a note that the P.O. is 10 miles south. The refinery consists of a pump house, a boiler house, a steam still, a crude oil still, and a number of smaller buildings, either unnamed or not legible. The area has approximately 20 round aboveground storage tanks of varying sizes. The map does not have a scale so sizes are not known. Contents include "crude oil, fuel oil, benzine (sic), and kerosene distillate." The railroad known to be in existence in 1915 and to bound the refinery on the east side is not on the map. Notes (largely illegible) state the refinery runs days and nights, is powered by steam, has gas lights, uses well water and has no fire "App" (possibly an abbreviation for "apparatus").

The 1920 Sanborn map shows the Continental Refining Co. oil refinery with a note that it is not currently in operation and is located three-quarters of a mile from the Bristow post office. The map has several features that fix its location such as the Public Road to the north and the S.L. & S.F.R.R. to the east with a spur line into the refinery with a loading platform. Topographic features are also shown, including the top of a steep slope down to the creek is on the west of the site, south of the road. There are many more buildings and about twice the number of tanks with half located north of the road, than were shown on the 1915 map. The notes indicate there is a single employee, apparently a watchman. Lighting is now electrical and there are four water wells. At least one tank north of the road has an earthen dike in case of a release.

The 1923 Sanborn map shows the Lorraine Refining Co. refinery complex in the area previously named the Continental Refining Co., as well as the H. F. Wilcox Oil & Gas Co. refinery directly east across the railroad tracks. The Lorraine refinery operations appear to be using the buildings acquired from Continental Oil, but several larger (up to 84,000 gallons) fuel oil tanks have been added southwest of the refinery as well as a cooling pond. Notes state that the refinery runs "day and night." The railroad spur still runs into the refinery and there is a clearly labeled wood loading deck along the east side. The number and relative size of the tanks north of the (now labeled "County Road") appears unchanged, but

there is a note that the tanks are surrounded by 3-foot high earthen dikes. The Wilcox refinery is considerably smaller and includes an office building, cooling tower, boiler, and several other structures. There are approximately 30 smaller tanks near the refinery buildings that hold fuel oil, kerosene distillate and gasoline. There are two larger (55,000 or 65,000 gallons) crude oil tanks with earthen dikes outside the fence around the refinery and to the southeast. A separate map shows six large, diked crude oil tanks, several smaller tanks and an outlined area labeled "oil pond" south of County Road. This may be part of the tank field located east of the refineries, but could not be confirmed.

(b) (5) The 1961 Sanborn map shows the area previously occupied by the Lorraine refinery as vacant two small unlabeled structures next to the County Road with a note stating it was the former location of "Producers Oil Co. oil refinery." A section of the former railroad spur into the refinery has been crossed out. There are no tanks shown across County Road to the north. The Wilcox refinery is greatly increased in size, number of buildings, and number of tanks. Additionally, there is a railroad spur into its location. The notes and identifiers are not legible except for the pond in the southeast portion of the facility within the fence. A separate map shows five large, diked crude oil tanks and four smaller crude oil tanks south of County Road with a note, "oil tanks beyond," and an arrow pointing to the east. This is believed to be part of the tank farm on the site, but could not be confirmed.

2.2 Historical Aerial Photographs

Historical Aerial Photographs are available from a number of private sources as well as government agencies, including the U.S. Geological Survey and the Natural Resources Conservation Service. Photographs showing the site were obtained for the years 1954, 1972, 1980, 1984, 1995, 2005, 2006, 2008, and 2010 (OPS-006, 007, 008).

Refinery buildings were not visible on any of the photographs, all of which post-dated the known time span of historical operations, except for 1954. That image has a very small scale (approximately two inches to the mile) and the only recognizable feature are some of the larger aboveground storage tanks in the tank farm south and east of the railroad track dividing the site.

The 1972 photograph (scale 1 inch to 500 feet) showed disturbed surface northwest of the tracks and buildings and large storage tanks, some surrounded by earthen dikes for release control, southeast of the railroad tracks. Most of the remaining structures are south of the east-west Public Road.

The 1980 and 1984 photographs (scale 1 inch to 1,000 feet) show little detail. The 1990 and later photographs (all one inch to 500 feet) show some development of the site with faint circular outlines marking the larger former tanks. There is also an undated low level oblique photograph taken of the refinery and part of the tank farm across the railroad tracks. While it is not possible to relate it to any other photographs, the most recent Sanborn map, dated 1961, shows some similarities in building and tank placement, and suggests the photograph was taken to the east-southeast in the 1960s toward the end of the refinery's operating life.

2.3 Historical Topographic Maps

Historical Topographic Maps are available from U.S. Geological Survey, as these maps are updated as needed. They often show features such as private roads, individual buildings, ponds and streams, power lines, large tanks and other features not necessarily present on standard commercial area maps. Maps dated 1901, 1916, and 1973 were received. These dates bracket the known operational period of the site; however the 1916 map does include a number of large tanks on the site labeled "oil tank farm." (OPS-009)

2.4 Trade Journals

Trade journals located online or in local libraries were reviewed for operation specifics at the site within the identified operational time frame of 1915 to 1963. Most journals reviewed did not have either business-specific or operations-specific information regarding the site. *The Refiner and Natural Gasoline Manufacturer*, however, had an article in its September 1930 edition titled *Wilcox Has Modern Installation in Bristow Plant*.

(b) (5) While the available copy is not entirely legible, the following information was readable. The "new refinery" was a year old at the time of the article and replaced the plant built ten years prior. The smaller, earlier plant had been operated by Riley Petroleum Company under lease. The new refinery consisted of "a skimmer plant, cracking unit, and re-distillation battery with vapor recovery system and continuous treating equipment." It was producing two grades of gasoline, but had the conversion capability to produce other products. The section on the cracking operation includes a reference to a spur track built from the railroad to the reaction chamber. Plant production ranged from 4,000 to 5,000 gallons per day, and both fuel oil and kerosene were also listed as products (OPS-017).

2.5 Expanded Site Inspection Report Wilcox Refinery 9-30-2011, SEMS Doc ID 643609

According to the 2011 report, the site consisted of three major operational areas: two crude oil processing areas that surrounded refined product storage; and a crude oil storage area. The railroad tracks dividing the two former processing areas and product storage areas are still in place. Little is left of the site of buildings or tanks. Most of the land has reverted to rural land, but with areas of stressed vegetation, barren areas, and visible black tarry waste of a hydrocarbon nature. There is, however, some redevelopment as a church, playground, and residences are located in former processing and storage areas.

The eastern portion of the site, once a former large crude oil tank farm, is occupied by four residences located very near to former tank locations. There is also visual evidence of stressed vegetation, barren areas, and visible black tarry waste in this area of a hydrocarbon nature. Drainage channels that empty into Sand Creek along the southern boundary of the site also appeared to contain petroleum-related waste (OPS-013).

The following summary of site contamination was largely developed from the 2011 Expanded Site Inspection Report:

Sample Type	# Samples Collected	# Samples w/ COCs	Contaminant of Concern
Surface Soil	7	4	7 SVOCs
Sediment	7	0	
Waste	9	4	10 SVOCs
Surface Soil	7	7	copper &/or lead &/or nickel
Sediment	7	4	copper &/or nickel
Waste	9	7	copper &/or lead &/or nickel

SVOCs > 3X background:

Benzo (b) fluoranthene
Benzo (a) pyrene
Chrysene
Indeno (123cd) pyrene
Fluoranthene
Phenanthrene
Pyrene
Benzo (ghi) perylene
Benzo (a) anthracene

(b) (5)

2.6 Preliminary Assessment Report of Wilcox Oil Co. 12-15-1994, SEMS Doc ID 9011570

According to the 1994 report, the Wilcox Oil Company operated a crude oil refinery on the site from the 1920s to early 1960s. It functioned as a pilot project in the 1920s, operated by Riley Petroleum Company and produced approximately 1,000 barrels of oil per day. A modern "skimming and cracking" plant was constructed in 1929 which had a refining capacity of 4,000 barrels of crude oil per day. The plant's components included a skimming plant, cracking unit, and re-distillation battery with a vapor recovery system. Crude oil was available from nearby oil field production, which eliminated the need for storage and handling facilities, but resulted in excessive high bottom sediment and water in the crude oil.

Wilcox Oil Company consolidated operations with the acquisition of the former Lorraine Refinery facility west of the railroad and the tank farm area to the east. The company divested itself of the entire site, totaling about 110 acres, in 1963 (OPS-013).

2.7 Site Inspection Report of Lorraine Refinery 8-18-2009, SEMS Doc ID 9515596

The 2009 report included sampling maps and tables of media samples and analytic results (OPS-013).

2.8 Preliminary Assessment of the Lorraine Refinery Site 9-28-2008, SEMS Doc ID 9095021

According to the 2008 report, the former location of the Lorraine Refinery contained multiple storage tanks and refinery operation buildings. The refinery structures and tanks have been leveled, and this portion of the site (as of the date of the report) was occupied by a church with paved parking. The property has trees, especially along the creek along the south boundary; however, this part of the site includes multiple areas of stressed vegetation, barren areas, and black tarry waste. Even in areas with ground cover, the soil underneath the vegetation appears impacted by contamination (OPS-013).

2.9 Title Document References

Some property transfer documents specifically list site improvements transferred with land that define the use of the property. The examples below clearly show activity on the site as early as 1914 that included both oil tank storage and refinery activities (OPS-001, 002).

A Deed dated October 10, 1914, from Thomas B. Slick to The Slick Oil Co. includes a portion of the site and lists tanks, oil, and equipment related to use of property as a "Tank Farm" (OPS-001).

A Trustee's Deed dated May 19, 1915, from C. J. Benson (Trustee in Bankruptcy of C.D. Webster Oil Company) to Joe Abraham wherein the sale included buildings and a "gasoline plant" (possibly an early reference to refining activities on the site), wooden oil tanks, and galvanized iron drums for transporting gasoline (OPS-001).

A Lease dated May 24, 1915, for the same property that specified its current use as an oil refinery be continued (OPS-001).

The same property was conveyed on September 29, 1916, with "the business of oil refining" included with the real property (OPS-001).

Following bankruptcy, the same property was conveyed out of receivership on July 2, 1923, with "the refinery, stills, pump houses, boiler houses, shop, and other buildings, tracks and tanks upon the premises." The mention of "tracks" could mean the railroad played an active role in site activities. Ownership of the tracks, however, is not specified (OPS-001).

By General Warranty Deed, a portion of the site plus "the refinery, stills, pump house boiler house, shop, other buildings, loading racks, tracks, and tanks" were conveyed on February 1, 1949 (OPS-001).

2.10 Parcel Map

Figure 1 is a parcel map from the Draft Title Search and Corporate History Report that Toeroek delivered to EPA in March 2014. The parcel numbers shown on this map are referenced in the next section when delineating the property that PRPs owned and operated on.

According to the 2011 Expanded Site Investigation Report, the site consisted of three major operational areas: two crude oil processing areas that surrounded refined product storage; and a crude oil storage area. The parcels associated with these functional areas are provided in the table below.

Functional Area	Parcels Impacted
Refined product storage	2, 3, 8, 10, 11, 12, 13, 14, 16
Processing Area	8, 10
Crude oil storage	4, 5, 6, 7, 8, 11, 12

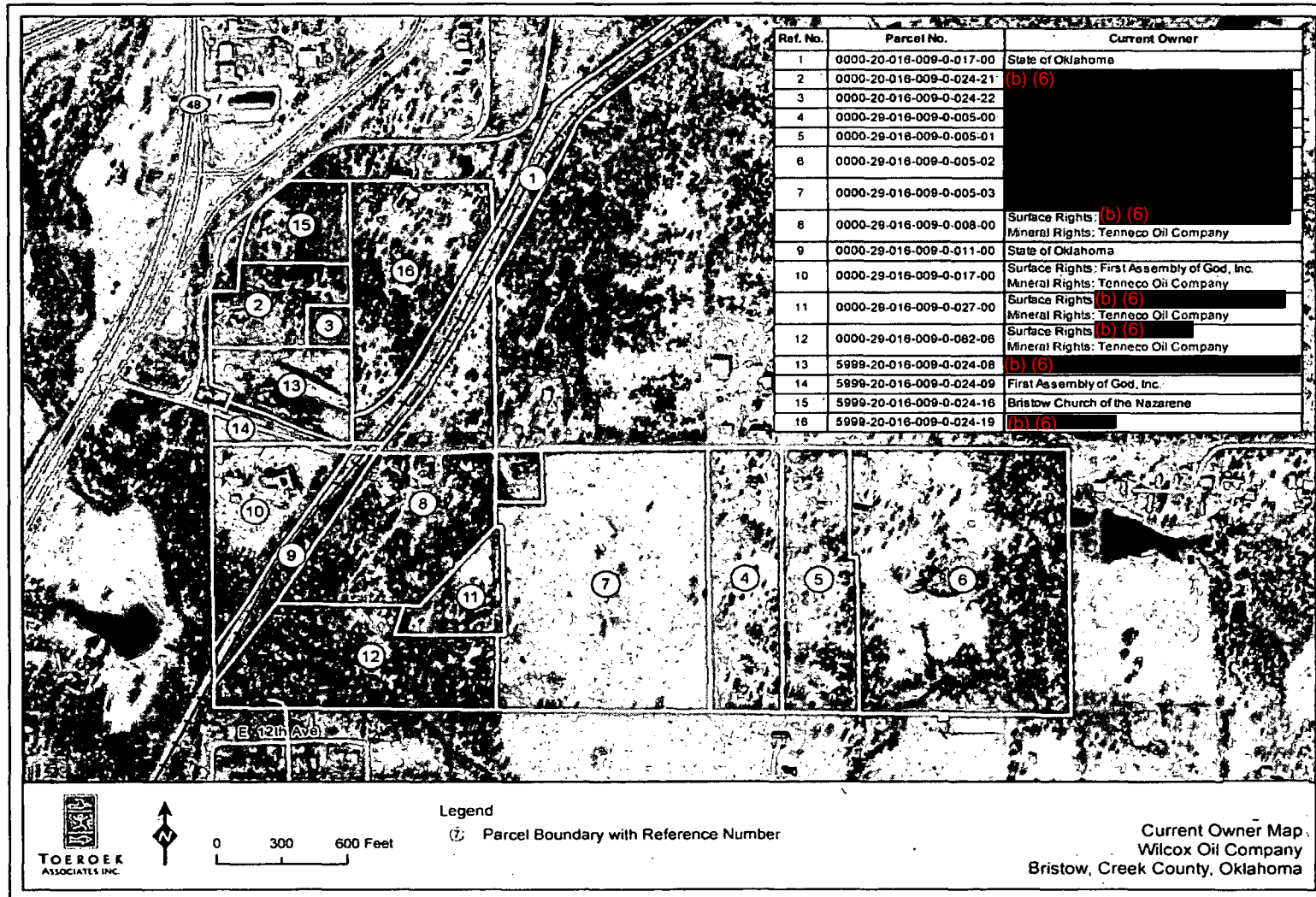


Figure 1. Parcel and Current Owner Map

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3.0 ENHANCED CORPORATE SUMMARIES

This section provides in depth corporate summaries that were prepared for the following entities as specified by EPA: BP Corporation North America, Inc.; BNSF Railway Company; Marathon Oil Company; and Sunoco, Inc. (R&M). Corporate complexities, however, resulted in multiple summaries for two of the companies in order to present the histories clearly; therefore, summaries are attached for the following seven entities:

- Atlantic Richfield Company
- BNSF Railway Company
- BP Corporation North America, Inc.
- BP Pipe Line North America, Inc.
- Marathon Oil Company
- Sunoco, Inc. (R&M)
- Sun Pipe Line Company

The primary intent of the summaries is two-fold: (1) to briefly re-state the evidence that links a predecessor company to the site as a PRP either as a former owner and/or former operator; and (2) to trace the corporate history of that entity to a viable successor. Each summary also includes the following topics: current contact information; site contaminants; and the defenses asserted in the PRPs' responses to EPA's 2014 Special Notice Letters. The corporate histories are also presented graphically in corporate trees.

Table 1: Summary Table of Potentially Responsible Parties (PRPs)				
PRPs	Class *	Period	Association with Site	Current Successor
Sinclair Oil & Gas Company	OW/OP	1929 - UNK	Owned oil, gas and other mineral rights in Parcels 7, 8, 11, and 12.	Atlantic Richfield Company
Sinclair Refining Company	OP	1938 - 1943	Right of way easement on Parcels 5, 6 and 7 for the laying, mainlining, operating, repairing, replacing and removing pipeline for the purpose of transporting crude petroleum, oil and gas.	
St. Louis-San Francisco Railway Company	OP	1927 - UNK	Acquired a 50-foot strip of land on site property (Parcels 1, 8, 9, 10, 11, 12, 16) for purpose of constructing and operating, railroad right of way.	BNSF Railway Company

Table 1: Summary Table of Potentially Responsible Parties (PRPs)				
PRPs	Class *	Period	Association with Site	Current Successor
Standard Oil Company	OP	1916 - UNK	Several tanksite leases indicated the company purchased oil and steel storage tanks and constructed and maintained pipelines for the transportation of crude petroleum (Parcels 4, 5, 6, 7, 8, 10, 12).	BP Corporation North America Inc.
Sinclair Pipe Line Company	OP	1921 - UNK	Held right of way easement on Parcels 5 and 6. Operations included the laying and maintaining of pipeline for the transportation of oil and gas.	BP Pipe Line North America, Inc.
Mid-Kansas Oil and Gas Company	OP	1930 – 1931	Mid-Kansas Oil and Gas Company and Ohio Oil Company were both past operators through a series of assignments of a Tanksite Lease on four site parcels (Parcels 8, 10, 11, 12).	Marathon Oil Company
Ohio Oil Company	OP	1936 - 1938		
OMR Pipe Line Company	OP	1967- 1972	Between 1967 and 1992, OMR Pipe Line Company and its successor Sun Pipe Line Company (PA), had right of way interests in Parcels 1, 4, 7, 8, 9, 10, 11, 12, 13 and 14 for the purpose of installing, operating, and maintaining pipelines on the site	Sun Pipe Line Company (TX)
Sun Pipe Line Company (PA)	OP	1972 - 1992		
Sunray Oil Corporation and Sunray DX Oil Company	OP	1946 – 1967	Between 1946 and 1967, Sunray Oil Corporation and its successors had right of way interests in Parcels 1, 4, 7, 8, 9, 10, 11, 12, 13 and 14 for the purpose of installing, operating, and maintaining pipelines on the site. These interests were conveyed to OMR Pipeline Company in 1967 (see OMR Pipeline Company above).	Sunoco, Inc. (R&M)

* PRP Class Key: OW = Owner, OP = Operator

3.1 Atlantic Richfield Company

ATLANTIC RICHFIELD COMPANY
(Successor to Sinclair Oil and Gas Company and Sinclair Refining Company)

PRP Class:	Past Owner and Operator (Sinclair Oil and Gas Company Past Operator (Sinclair Refining Company)
Status:	Active
Period of Activity:	Sinclair Oil and Gas Company. 1929 – Unknown Sinclair Refining Company. 1938 – 1943
Current Contact:	Douglas S. Reinhart, Senior Counsel BP America Inc. 105 W. Warrenville Road Mail Code 200-1W Naperville, Illinois 60563 (630) 420-5457

1. How this corporate entity is tied to the site

Atlantic Richfield Company is the successor to two PRPs: Sinclair Oil and Gas Company and Sinclair Refining Company. **Sinclair Oil and Gas Company** acquired the oil, gas and other mineral rights in, to and under Parcels 7, 8, 11, and 12 from Slick Oil Company through a Special Warranty Deed on December 14, 1929 (TITLE-017). No recorded document was located by the title search to indicate a date of termination of Sinclair Oil and Gas Company's ownership of these interests.

Sinclair Refining Company operated on Parcels 5, 6 and 7 through a right of way easement beginning on January 6, 1938 (TITLE-024). The easement allowed for the laying, mainlining, operating, repairing, replacing and removing pipeline for the purpose of transporting crude petroleum, oil and gas. A release of right of way was executed on April 15, 1943 (TITLE-026).

2. Contaminated parcels tied to PRP

Sampling results reported in the 2011 Expanded Site Inspection Report identify site locations contaminated with hazardous substances (SEMS-06_643609). The table below groups the impacted parcels that contain contamination by functional area (column 2) and lists the impacted parcels that Sinclair Oil and Gas Company and Sinclair Refining Company either owned or operated (columns 3 and 4).

Functional Area	Parcels Impacted	Impacted Parcels Tied to	
		Sinclair Oil and Gas Co.	Sinclair Refining Co.
Refined product storage	2, 3, 8, 10, 11, 12, 13, 14, 16	8, 11, 12	
Processing Area	8, 10	8	
Crude oil storage	4, 5, 6, 7, 8, 11, 12	7, 8, 11, 12	5, 6, 7

3. Ownership/Operation chronology

Date	Event	Reference No.
12/14/1929	The Slick Oil Company conveyed the oil, gas and other mineral rights to land that includes Parcels 7, 8, 11, and 12 to Sinclair Oil and Gas Company. A future conveyance by Sinclair Oil and Gas Company was not located in the recorded documents.	TITLE-017
1/6/1938	H.F. Wilcox Oil & Gas Company granted an right of way easement to Sinclair Refining Company for the right to lay, maintain, inspect, operate, repair, replace, and remove a pipe line for the transportation of crude petroleum, oil, gas, the products or by-products of each thereof and also water. The land described in the easement covered Parcels 5, 6, and 7.	TITLE-024
4/15/1943	Sinclair Refining Company released the easement to the present owner of the land.	TITLE-026

4. Corporate history with current name

Sinclair Oil and Gas Company		
4/24/1916	Sinclair Oil and Gas Company was incorporated in Maine	SOS-011
3/31/1932	Sinclair Oil and Gas Company changed its name to Sinclair Prairie Oil Company	SOS-012
5/3/1949	Sinclair Prairie Oil Company, Sinclair Wyoming Oil Company, and Repollo Oil Company reorganized and merged as Sinclair Prairie Oil Company, and changed its name to Sinclair Oil & Gas Company	SOS-013
9/30/1968	Sinclair Oil & Gas Company merged with Sinclair Refining Company, to form Sinclair Oil Corporation	SOS-014

3/4/1969	Sinclair Oil Corporation merged into Atlantic Richfield Company	SOS-015
5/7/1985	Atlantic Richfield Company merged into Richfield Delaware Corporation and changed its name to Atlantic Richfield Company	SOS-016
3/6/2013	Atlantic Richfield Company was listed a wholly owned subsidiary of BP P.L.C. and is an active company that is in good standing	SEC-003; SOS-038

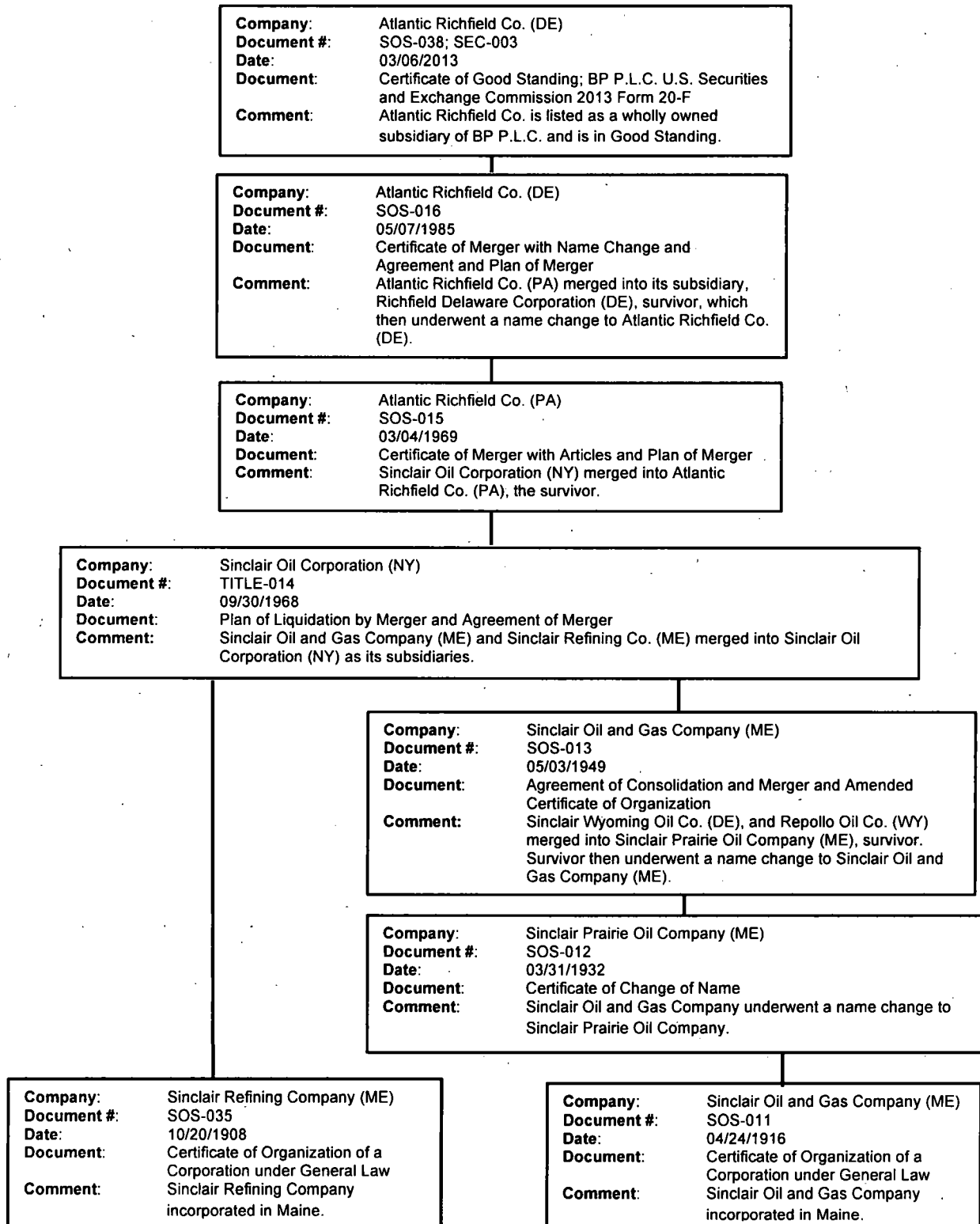
Sinclair Refining Company		
10/20/1908	Sinclair Refining Company was incorporated in Maine	SOS-035
9/30/1968	Sinclair Oil & Gas Company merged with Sinclair Refining Company, to form Sinclair Oil Corporation	SOS-014
3/4/1969	Sinclair Oil Corporation merged into Atlantic Richfield Company	SOS-015
5/7/1985	Atlantic Richfield Company merged into Richfield Delaware Corporation and changed its name to Atlantic Richfield Company	SOS-016
3/6/2013	Atlantic Richfield Company is listed as a wholly owned subsidiary of BP P.L.C. and is an active company in good standing	SEC-003; SOS-038

5. Defenses asserted by the PRP

Douglas S. Reinhart, Senior Counsel for BP America, Inc. responded on behalf of Atlantic Richfield Company and BP Corporation to the Special Notice Letters sent on July 28, 2014. The documents provided by EPA do not suggest that Atlantic Richfield Company or BP have any connection to the site that would lead them to enter into an Administrative Order of Consent. Specifically regarding the evidentiary documents provided in the Special Notice Letter, the respondent asserts the following defenses:

- "Continuation of Abstract Title to Lands Described in the Caption Herein" in which the respondent states Continental Refining Company and St. Louis -San Francisco Railway Co. were mentioned in the document, and neither entity has an association with Atlantic Richfield Company or BP Corporation (104E-003).
- The Tanksite Lease dated November 15, 1915, between Slick Oil Company and Standard Oil Company indicated crude petroleum was sold to Standard Oil Company by Slick Oil Company. The respondent asserts that the CERCLA petroleum exclusion applies in this instance (104E-003).

**Atlantic Richfield Company (DE) Corporate Tree
(Sinclair Oil and Gas Company / Sinclair Refining Company)**



3.2 BNSF Railway Company

BNSF RAILWAY COMPANY

(Successor to St. Louis-San Francisco Railway Company, Burlington Northern, Inc., Burlington Northern Railroad Company, The Burlington Northern and Santa Fe Railway Company)

PRP Class:	Past Owner and Operator
Status:	Active
Period of Activity:	1927 - Unknown
Current Contact:	John N. Hason Beveridge & Diamond PC for BNSF Railway Company 1350 I Street, N.W. Suite 700 Washington, D.C. 20005-7202 (202) 789-6015 (104E-001, SEMS-06_712645)

1. How this corporate entity is tied to the site

BNSF Railway Company is the successor to St. Louis-San Francisco Railway Company, which acquired a 50-foot strip of land on site property on February 27, 1917 for the purpose of constructing, operating, and maintaining a railroad right of way and spur track, as well as for all other purposes incidental to railroad uses (TITLE-008; TITLE-009). The right of way existed on site parcels 1, 8, 9, 10, 11, 12 and 16. The St. Louis-San Francisco Railway Company and its successors operated a railroad on this strip of land and connecting spurs during the time the refinery operations on site property occurred.

A Sanborn map dated February 1920 depicts the St. Louis-San Francisco Railroad spur track connected to the main line. Adjacent to the spur track, labeled as the "oil tank car loading track," there were two 10-foot loading platforms. The Sanborn map dated October 1923 depicts three 10-foot wood loading racks; two along the spur track and one along the main track. According to the Sanborn map from 1961, at that time, there was only one remaining 10-foot loading rack adjacent to the main line of the St. Louis-San Francisco Railroad (OPS-010).

On February 25, 1999, The Burlington Northern and Santa Fe Railway Company, successor to the St. Louis-San Francisco Railway Company, conveyed and donated at least two parcels, Parcels 1 and 9, to the Oklahoma Department of Transportation (TITLE-020; SOS-002; SOS-003; SOS-004). The Burlington Northern and Santa Fe Railway Company reserved a permanent easement over the parcels for freight rail service, passenger rail service, and construction and maintenance of fiber optic communication lines (TITLE-020).

2. Contaminated parcels tied to PRP

Sampling results reported in the 2011 Expanded Site Inspection Report identify site locations contaminated with hazardous substances (SEMS-06_643609). The table below groups the impacted parcels that contain contamination by functional area (column 2) and lists the impacted parcels that the railroad operated on (column 3).

Functional Area	Parcels Impacted	Impacted Parcels Tied to Railroad
Refined product storage	2, 3, 8, 10, 11, 12, 13, 14, 16	8, 10, 11, 12, 16
Processing Area	8, 10	8, 10
Crude oil storage	4, 5, 6, 7, 8, 11, 12	8, 11, 12

3. Ownership/Operation chronology

Date	Event	Reference No.
2/27/1917	Continental Refining Company conveyed Parcels 8, 9, 10, 11 and 12 to the St. Louis-San Francisco Railway Company. The strip of land was 50 feet in width; 25 feet to each side of the proposed railroad tracks. The property was conveyed under the premise that it would be used for a railroad right of way.	TITLE-008
2/27/1917	Deed of easement between Yarmo Harjo and the St. Louis-San Francisco Railway Company for Parcels 1 and 16. The land conveyed, a tract 50 feet in width, was to be used for a spur track.	TITLE-009
10/16/1963	A plat map was certified as showing the location of the Main Line and the Spur Tracks of the St. Louis-San Francisco Railway Company over and across Parcels 1 and 9. This certificate notes that a Spur Track Contract, dated January 28, 1935, was entered into between H.F. Wilcox Oil & Gas Company and the St. Louis-San Francisco Railway Company.	TITLE-031
2/25/1999	Burlington Northern and Santa Fe Railway Company conveyed the rail corridor of land on Parcels 1 and 9, to the Oklahoma Department of Transportation.	TITLE-020

4. Corporate history with current name

8/24/1916	St. Louis-San Francisco Railway Company was incorporated in Missouri.	SOS-001
11/24/1980	St. Louis-San Francisco Railway Company merged into Burlington Northern Inc.	SOS-002

5/14/1981	Burlington Northern Inc., survivor of a merger with Burlington Northern Transportation Co., changed its name to Burlington Northern Railroad Company.	SOS-003
12/30/1996	The Atchison, Topeka and Santa Fe Railway Company merged with and into Burlington Northern Railroad Company to form the Burlington Northern and Santa Fe Railway Company.	SOS-004
1/20/2005	The Burlington Northern and Santa Fe Railway Company changed its name to BNSF Railway Company.	SOS-005

5. Defenses asserted by the PRP

BNSF asserts that:

- a "railroad ROW in the nature of an easement is not a sufficient property interest to give rise to owner liability under CERCLA" (104E-001).
- "BNSF's operations on the Main Line or the Spur [do not] implicate the Company as a liable 'operator' under Section 107(a)" (104E-001).

BNSF Railway Company (MO) Corporate Tree

Company: The Burlington Northern and Santa Fe Railway Co. (DE)
Document #: SOS-005
Date: 01/20/2005
Document: Restated Certificate of Incorporation of The Burlington Northern and Santa Fe Railway Company
Comment: The name of The Burlington Northern and Santa Fe Railway Company changed to BNSF Railway Co.

Company: Burlington Northern Inc. (DE)
Document #: SOS-004
Date: 12/30/1996
Document: Certificate of Merger with Restated Certificate of Incorporation of The Burlington Northern and Santa Fe Railway Co.
Comment: Survivor's name changed to The Burlington Northern and Santa Fe Railway Co.

Company: Burlington Northern Inc. (DE)
Document #: SOS-003
Date: 05/14/1981
Document: Merger
Comment: Burlington Northern Transportation Co. (DE) merged into Burlington Northern Inc., (survivor).

Company: St. Louis-San Francisco Railway Co. (MO)
Document #: SOS-002
Date: 1/24/1980
Document: Articles of Merger
Comment: St. Louis-San Francisco Railway Co merged into Burlington Northern Inc. (survivor) (DE).

Company: St. Louis-San Francisco Railway Co. (MO)
Document #: SOS-001
Date: 08/24/1916
Document: Articles of Association of St. Louis-San Francisco Railway Co.
Comment: Company incorporated in Missouri

Company: Burlington Northern Inc.
Document #: SOS-005
Date: 01/13/1961
Document: Certificate of Incorporation
Comment: Company incorporated in Delaware as Great Northern Pacific & Burlington Lines, Inc.

3.3 BP Corporation North America, Inc.

BP CORPORATION NORTH AMERICA, INC.
(Successor to Standard Oil Company)

PRP Class: Past Operator
Status: Active
Period of Activity: 1916 - Unknown
Current Contact: Douglas S. Reinhart, Senior Counsel
BP America Inc.
105 W. Warrenville Road
Mail Code 200-1W
Naperville, Illinois 60563
(630) 420-5457 (104E-003, SEMS-06_712644)

1. How this corporate entity is tied to the site

BP Corporation North America, Inc. is the successor to Standard Oil Company, which operated on the site (Parcels 4, 5, 6, 7, 8, 10, 11, and 12) beginning November of 1915 until an unspecified date. Several tanksite leases indicated the company purchased oil and steel storage tanks from Slick Oil Company, and constructed and maintained pipelines for the transportation of crude petroleum (TITLE-005; TITLE-006; TITLE-007).

2. Contaminated parcels tied to PRP

Sampling results reported in the 2011 Expanded Site Inspection Report identify site locations contaminated with hazardous substances (SEMS-06_643609). The table below groups the impacted parcels that contain contamination by functional area (column 2) and lists the impacted parcels that Standard Oil Company operated on (column 3).

Functional Area	Parcels Impacted	Impacted Parcels Tied to Standard Oil Company
Refined product storage	2, 3, 8, 10, 11, 12, 13, 14, 16	8, 10, 11, 12
Processing Area	8, 10	8, 10
Crude oil storage	4, 5, 6, 7, 8, 11, 12	4, 5, 6, 7, 8, 11, 12

3. Ownership/Operation chronology

Date	Event	Reference No.
11/15/1915	The Slick Oil Company entered into a Tanksite Lease that transferred three steel storage tanks containing oil to Standard Oil Company. The terms of the lease stated the transferred tanks would be protected by Standard Oil Company. The tanks were situated on land described as Parcels 4 through 8 and Parcels 10 through 12.	TITLE-005
11/15/1915	The Slick Oil Company entered into a second Tanksite Lease with Standard Oil Company that allowed Standard Oil Company to construct, erect, maintain, and operate steel storage tanks for the storage of crude oil, and to construct, maintain, and own pipe lines as were necessary for the use of storage tanks. The land described in this lease included Parcels 4, 5, 7, 8, and Parcels 10 through 12.	TITLE-006
11/15/1915	The Slick Oil Company entered into a third Tanksite Lease with Standard Oil Company that sold crude petroleum to Standard Oil Company. The Crude Oil was stored in steel storage tanks that were located on land that included Parcels 4, 5, 7, 8, and Parcels 10 through 12.	TITLE-007

4. Corporate history with current name

6/18/1889	Standard Oil Company was incorporated in Indiana	SOS-006
4/23/1985	Standard Oil Company changed its name to Amoco Corporation	SOS-007
12/31/1998	Amoco Corporation changed its name to BP Amoco Corporation	SOS-008
4/1/2001	BP Amoco Corporation changed its name to BP Corporation North America Inc.	SOS-009
3/6/2013	BP Corporation North America, Inc., was listed as a wholly owned subsidiary of BP P.L.C. and is an active company that is in good standing.	SEC-003; SOS-039

5. Defenses asserted by the PRP

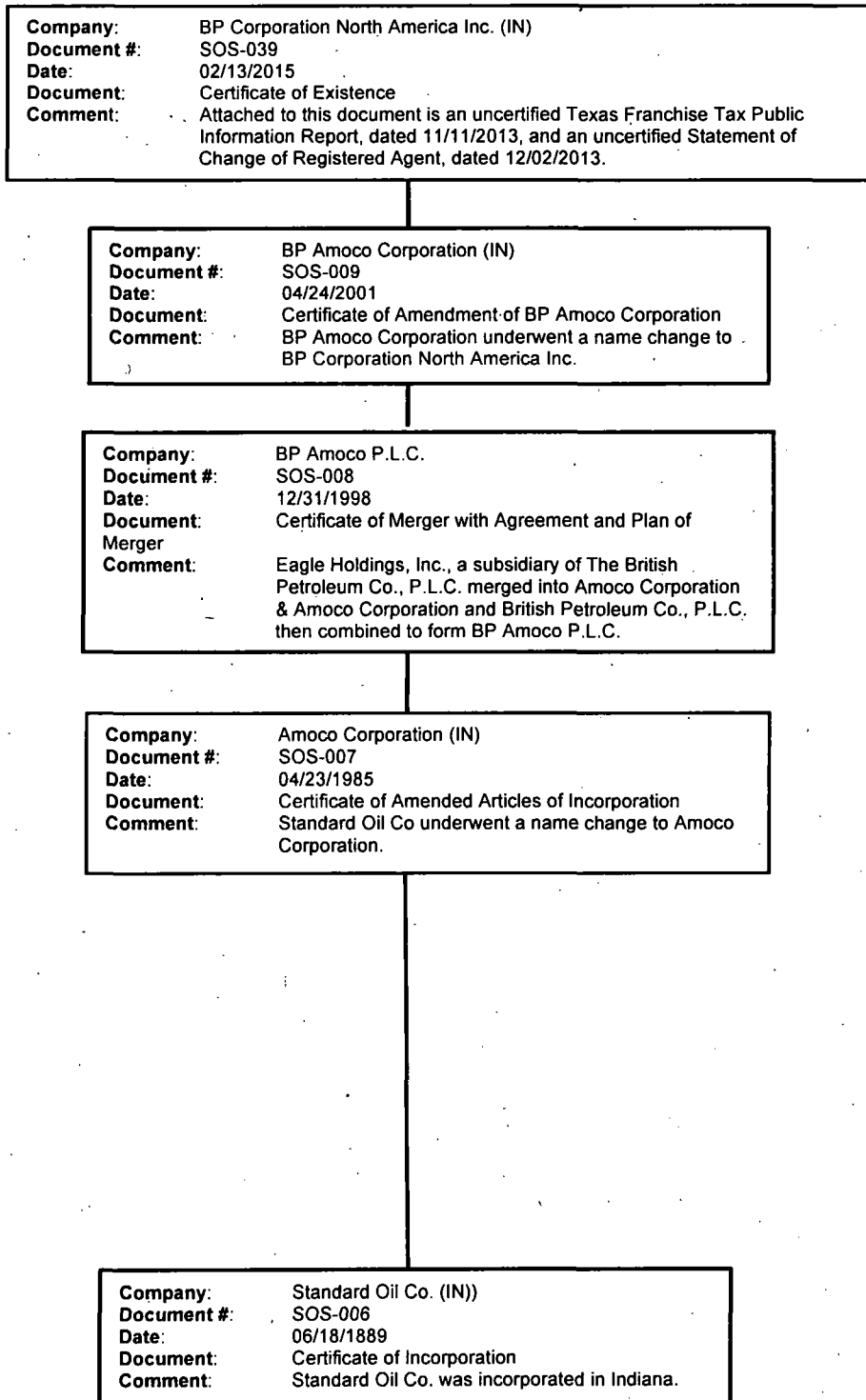
Douglas S. Reinhart, Senior Counsel for BP America Inc. responded on behalf of Atlantic Richfield Company and BP Corporation to the Special Notice Letters sent on July 28, 2014. The documents provided by EPA do not suggest that Atlantic Richfield Company or BP have any connection to the Site that would lead them to enter into an Administrative Order of Consent. Specifically regarding the

evidentiary documents provided in the Special Notice Letter, the respondent asserts the following defenses:

- (b) (5)
- "Continuation of Abstract Title to Lands Described in the Caption Herein" in which the respondent states Continental Refining Company and St. Louis –San Francisco Railway Co. were mentioned in the document, and neither entity has an association with Atlantic Richfield Company or BP Corporation (104E-003).
 - The Tanksite Lease dated November 15, 1915, between Slick Oil Company and Standard Oil Company indicated crude petroleum was sold to Standard Oil Company by Slick Oil Company. The respondent asserts that the CERCLA petroleum exclusion applies in this instance (104E-003).

Note that one of the three Tanksite leases entered by Standard Oil Company was attached to the SNL sent to BP America Inc.

BP Corporation North America, Inc. Corporate Tree



3.4 BP Pipelines (North America) Inc.

BP PIPELINES (NORTH AMERICA) INC.
(Successor to Sinclair Pipe Line Company)

PRP Class: Past Operator
Status: Active
Period of Activity: 1921 - Unknown
Current Contact: Douglas S. Reinhart, Senior Counsel
BP America Inc.
105 W. Warrenville Road
Mail Code 200-1W
Naperville, Illinois 60563
(630) 420-5457 (104E-003, SEMS-06_712644)

1. How this corporate entity is tied to the site

Sinclair Pipe Line Company operated on the site at Parcel 5 and Parcel 6 beginning May 5, 1921, through a Right of Way Easement. Operations included the laying and maintaining of pipeline for the transportation of oil and gas. Sinclair Pipe Line Company was also granted the right to erect maintain and operate telegraph or telephone lines on the site (TITLE-010).

In a 1963 court case that intended to quiet the title to the property, Sinclair Pipe Line Company was said to have released the right of way to Service Pipe Line Company, however there was no record of this assignment. Additionally it was said that the right of way had long since been abandoned and was inactive for over than 30 years (TITLE-032).

2. Contaminated parcels tied to PRP

Sampling results reported in the 2011 Expanded Site Inspection Report identify site locations contaminated with hazardous substances (SEMS-06_643609). The table below groups the impacted parcels that contain contamination by functional area (column 2) and lists the impacted parcels that Sinclair Pipe Line Company operated on (column 3).

Functional Area	Parcels Impacted	Impacted Parcels Tied to Sinclair Pipe Line Company
Refined product storage	2, 3, 8, 10, 11, 12, 13, 14, 16	
Processing Area	8, 10	
Crude oil storage	4, 5, 6, 7, 8, 11, 12	5, 6

3. Ownership/Operation chronology

Date	Event	Reference No.
5/5/1921	H.F. Wilcox Oil & Gas Company granted Sinclair Pipe Line Company the right to lay, maintain, operate and remove a pipe line for the transportation of oil or gas and erect, maintain and operate a telegraph or telephone lines on land that included Parcels 5 and 6. Termination was not located in the recorded documents.	TITLE-010
12/9/1963	In a court case that intended to quiet the title to the property, Sinclair Pipe Line Company was said to have released the right of way to Service Pipe Line Company, however there was no record of this assignment. Additionally it was said that the right of way had long since been abandoned and was inactive for over than 30 years.	TITLE-032

4. Corporate history with current name

4/25/1916	Sinclair-Cudahy Pipe Line Company was incorporated in Maine	SOS-031
1/26/1920	Sinclair Cudahy Pipe Line Company changed its name to Sinclair Pipe Line Company	TITLE-029
10/6/1930	Sinclair Pipe Line Company changed its name to Stanolind Pipe Line Company	TITLE-029
5/1/1950	Stanolind Pipe Line Company changed its name to Service Pipe Line Company	TITLE-029
1/29/1957	Service Pipe Line Company merged into American Oil Pipe Line Company	SOS-032
4/1/1970	American Oil Pipe Line Company changed its name to Amoco Pipeline Company	SOS-036
4/2/2001	Amoco Pipeline Company changed its name to BP Pipelines (North America) Inc.	SOS-033
1/12/2015	An unofficial source (Businessweek) lists BP Pipelines (North America) Inc. as a subsidiary of BP P.L.C. and BP's website summarizes the operations of BP Pipelines (North America) Inc. Additionally, BP Pipelines (North America) Inc. is an active company in good standing.	INT-003; INT-004; SOS-037

5. Defenses asserted by the PRP

Douglas S. Reinhart, Senior Counsel for BP America Inc. responded on behalf of Atlantic Richfield Company and BP Corporation to the Special Notice Letters sent on July 28, 2014. The documents provided by EPA do not suggest that Atlantic Richfield Company or BP have any connection to the Site that would lead them to enter into an Administrative Order of Consent. Specifically regarding the evidentiary documents provided in the Special Notice Letter, the respondent asserts the following defenses:

- "Continuation of Abstract Title to Lands Described in the Caption Herein" in which the respondent states Continental Refining Company and St. Louis –San Francisco Railway Co. were mentioned in the document, and neither entity has an association with Atlantic Richfield Company or BP Corporation (104E-003).
- The Tanksite Lease dated November 15, 1915 between Slick Oil Company and Standard Oil Company indicated crude petroleum was sold to Standard Oil Company by Slick Oil Company. The respondent asserts that the CERCLA petroleum exclusion applies in this instance (104E-003).

BP Pipelines (North America) Inc. Corporate Tree

Company: BP Pipelines (North America) Inc.
Document #: SOS-037; INT-003; INT-004
Date: 01/12/2015
Document: Maine Secretary of State 2014 Annual Report
Comment: BP Pipelines (North America), Inc. is in good standing with the state of Maine.
Other sources list the company as a subsidiary of BP, P.L.C.

Company: BP Pipelines (North America) Inc.
Document #: SOS-033
Date: 04/02/2001
Document: Articles of Amendment
Comment: Amoco Pipeline Co. (ME) underwent a name change to BP Pipelines (North America) Inc., subsidiary of BP Amoco Co.

Company: Amoco Pipeline Co. (ME)
Document #: SOS-036
Date: 04/01/1970
Document: Certificate of Change of Name
Comment: Service Pipe Line Co. (ME) underwent a name change to Amoco Pipeline Co.

Company: Service Pipe Line Co. (ME)
Document #: SOS-032
Date: 1/29/1957
Document: Agreement of Merger
Comment: American Pipe Line Co., a Delaware corporation, incorporated on 07/21/1933, merged into Service Pipe Line Co. (ME), the survivor.

Company: Service Pipe Line Co. (ME)
Document #: TITLE-029
Date: 05/01/1950
Document: Certified Resolution of Board of Directors (dated 05/31/1950)
Comment: Stanolind Pipe Line Co. underwent a name change to

Company: Stanolind Pipe Line Co. (ME)
Document #: TITLE-029
Date: 01/06/1930
Document: Certified Resolution of Board of Directors (dated 05/31/1950)
Comment: Sinclair Pipe Line Co. underwent a name change to Stanolind Pipe Line Co.

Company: Sinclair Pipe Line Co. (ME)
Document #: TITLE-029
Date: 01/26/1920
Document: Certified Resolution of Board of Directors (dated 05/31/1950)
Comment: Sinclair-Cudahy Pipe Line Co. underwent a name change to Sinclair Pipe Line Co.

Company: Sinclair-Cudahy Pipe Line Co. (ME)
Document #: SOS-031
Date: 04/25/1916
Document: Certificate of Organization of a Corporation under the General Law
Comment: Sinclair-Cudahy Pipe Line Co. was incorporated in Maine.

3.5 Marathon Oil Company

MARATHON OIL COMPANY

(Successor to Mid-Kansas Oil and Gas Company (WV) and Ohio Oil Company)

PRP Class:	Past Operator
Status:	Active
Period of Activity:	1930 – 1931, 1936 - 1938
Current Contact:	Lee M. Tillman, President and CEO Marathon Oil Company 5555 San Felipe Street Houston, Texas 77056-2723 713-629-6600 (INT-005, SEC-004)

1. How this corporate entity is tied to the site

Mid-Kansas Oil and Gas Company and Ohio Oil Company were both past operators through a series of assignments of a tanksite lease on the four parcels that comprise most of the Northwest Quarter of the Northwest Quarter of Section 29, specifically Parcels 8, 10, 11 and 12.

A predecessor company to Marathon Oil Company, Mid-Kansas Oil and Gas Company, acquired a lease on a tank site on the Wilcox Oil site through assignment on August 14, 1930. The original term of the Agreement that initiated the tanksite lease (dated December 28, 1927) was 20 years. Predecessor companies held the lease from 9/2/1930 to 1/29/1931 (Mid-Kansas Oil and Gas Company) and from 9/30/1935 to 8/19/1938 (Marathon Oil Company / Ohio Oil Company) for a total of approximately three and a half years. Upon dissolution of Marathon Oil Company (WV) on July 31, 1936, the tanksite lease assignment was among the assets transferred to its sole shareholder, The Ohio Oil Company.

The tanksite lease occupied the entire northwest quarter of the northwest quarter of Section 29, Township 16 North, Range 9 East, except for the railroad right-of-way (Parcel 9). This originally included site parcels 8, 10, 11, and 12, but Parcel 10, north and west of the railroad right-of-way, was released to the landowner before the other three were assigned to a company not related to the currently viable Marathon Oil Company.

The ensuing corporate histories trace The Ohio Oil Company to the currently active and viable respondent, Marathon Oil Company, a Delaware corporation.

2. Contaminated parcels tied to PRP

Sampling results reported in the 2011 Expanded Site Inspection Report identify site locations contaminated with hazardous substances (SEMS-06_643609). The table below groups the impacted

parcels that contain contamination by functional area (column 2) and lists the impacted parcels that Mid-Kansas Oil and Gas Company and Ohio Oil Company operated on (column 3).

Functional Area	Parcels Impacted	Impacted Parcels Tied to Mid-Kansas Oil and Gas Company and Ohio Oil Company
Refined product storage	2, 3, 8, 10, 11, 12, 13, 14, 16	8, 10, 11, 12
Processing Area	8, 10	8, 10
Crude oil storage	4, 5, 6, 7, 8, 11, 12	8, 11, 12

3. Ownership/Operation chronology

Date	Event	Reference No.
12/28/1927	A. A. Rollestone executed an Agreement to lease Tanksite No. 2 in Parcels 8, 10, 11, and 12 to Transcontinental Oil Company by an Agreement with a term of 20 years.	TITLE-016
9/02/1930	Transcontinental Oil Company assigned the leasehold to Mid-Kansas Oil and Gas Company.	TITLE-018
1/29/1931	Mid-Kansas Oil and Gas Company assigned the leasehold to Illinois Pipe Line Company.	TITLE-019
9/30/1935	Illinois Pipe Line Company assigned the leasehold to Marathon Oil Company, a West Virginia corporation and F/K/A Mid-Kansas Oil and Gas Company.	TITLE-021
9/10/1936	Marathon Oil Company underwent voluntary dissolution with all assets, including the Tanksite Lease assignment, conveyed to its sole shareholder, Ohio Oil Company.	TITLE-023
8/16/1937	Ohio Oil Company released the portion of the lease that covered Parcel 10, to the landowner and original lessor, A. A. Rollestone, while retaining rights to Parcels 8, 11, and 12.	TITLE-022
8/19/1938	Ohio Oil Company assigned the remainder of the leasehold, including Parcels 8, 11, and 12, to H.F. Wilcox Oil and Gas Company, ending the company's relationship with the site.	TITLE-025

3. Corporate history with current name

Ohio Oil Company		
07/31/1887	The Ohio Oil Company was incorporated in Ohio for the purpose of exploring and drilling for petroleum. The company qualified	SOS-017; SOS-043

	to conduct business in Oklahoma as a foreign entity on July 30, 1936.	
12/29/1915	Mid-Kansas Oil and Gas Company was incorporated in West Virginia.	SOS-044
08/08/1934	Mid-Kansas Oil and Gas Company underwent a name change to Marathon Oil Company.	TITLE-023
09/10/1936	Sole stockholder, Ohio Oil Company, acquired all assets at the dissolution of Marathon Oil Company (WV), including the assigned tanksite lease.	TITLE-023
06/04/1962	Ohio Oil Company changed its name to Marathon Oil Company (OH).	SOS-018
01/01/1966	United States Steel Corporation was authorized to conduct business in Ohio as a foreign corporation. According to the State of Delaware Statement of Good Standing, the company had been incorporated on 09/16/1964.	SOS-045
11/18/1981	USS Holdings Company was incorporated in Ohio. The company acquired Marathon Oil Company (OH) as a subsidiary in 1982.	SOS-046; INT-001
07/09/1982	USS Holdings Company, an Ohio corporation, changed its name to Marathon Oil Company (OH).	SOS-047
07/09/1982	Marathon Petroleum Company (DE) merged into Marathon Oil Company (OH) and the survivor changed its name to Marathon Petroleum Company (OH).	SOS-019
06/23/1986	USX Corporation was incorporated in Delaware.	SOS-048
12/20/1990	Marathon Petroleum Company (OH) and TXO Production Corp. (DE), both wholly owned subsidiaries of Marathon Oil Company (OH), merged into the parent company. At the time of the merger, USX Corporation, a Delaware corporation, owned 98% of the surviving entity's shares with Texas Oil & Gas Corp. owning the remaining 2%.	SOS-020
05/30/2001	Marathon Oil Corporation was incorporated in Delaware.	SOS-049
07/02/2001	USX Corporation (DE) merged into United States Steel Corporation, a Delaware corporation. According to both the United State Steel Corporation and the Marathon Oil Corporation websites, the merger was part of a plan to create two separate companies, one for steel-related businesses and one, Marathon Oil Corporation, for energy-related businesses.	SOS-050
02/21/2002	Marathon Oil Corporation (DE) was authorized to conduct business in Ohio.	SOS-051

06/30/2011	Marathon Oil Corporation was separated into two independent companies: Marathon Oil Company (upstream business) and Marathon Petroleum Company (downstream business).	INT-002; SEC-004
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5. Defenses asserted by the PRP

Marathon Oil Company in a response letter dated September 12, 2014, and signed by Rebecca Skiba, Group Counsel in Law-Regulatory Compliance, asserted the following defenses (SNL-004; SEMS-6_9526372):

(b) (5)

- The information allegedly tying the company to the site is meager.
- The information provided does not include evidence that the company operated either refinery.
- Recent changes in corporate organization make it difficult to determine if Marathon Oil Company or Marathon Petroleum Company should "take the lead" in responding to EPA's Special Notice Letter.

Marathon Oil Co. (DE) Corporate Tree

Company: Marathon Oil Corporation (DE)
Document #: SEC-004; INT-002
Date: 01/31/2014
Document: Form 10-K
Comment: On 6/30/2011, Marathon Oil Corporation separated into Marathon Oil Co. (upstream business) & Marathon Petroleum Co. (downstream business). Both are currently viable DE entities.

Company: Marathon Oil Corporation (DE)
Document #: SOS-051
Date: 02/21/2002
Document: Foreign License for Profit Articles of Incorporation
Comment: Authorization for Marathon Oil Corp. to do business in Ohio included company's DE incorporation date of 5/30/2001.

Company: United States Steel LLC (DE)
Document #: SOS-050
Date: 07/02/2001
Document: Merged out of Existence
Comment: USX Corp. (owner of Marathon Oil Co.) merged into United States Steel LLC (DE), as part of a plan to create separate companies for steel-related business (United State Steel) and energy-related business (Marathon Oil).

Company: Marathon Oil Corporation (DE)
Document #: SOS-049
Date: 05/30/2001
Document: Delaware Secretary of State Entity Details
Comment: Marathon Oil Corporation was incorporated in Delaware.

Company: Marathon Oil Company (OH)
Document #: SOS-020
Date: 12/20/1990
Document: Ohio Certificate of Merger with attached Agreement of Merger
Comment: Marathon Petroleum Co. (OH) & TXO Production Co. (DE) merged into Marathon Oil Co. (OH). 98% of survivor's stock was owned by USX Corporation (DE).

Company: USX Corporation
Document #: SOS-048
Date: 06/23/1986
Document: DE SOS Entity Details
Comment: USX Corporation incorporated in Delaware.

Company: Marathon Oil Company (OH)
Document #: SOS-019
Date: 07/09/1982
Document: Merger
Comment: Marathon Petroleum Co. (DE) merged into Marathon Oil Co. (OH), the survivor. Marathon Oil Co. (OH) changed its name to Marathon Petroleum Co. (OH).

Company: USS Holdings Company (OH)
Document #: SOS-047
Date: 07/09/1982
Document: Certificate of Adoption of Amendment
Comment: Name change from USS Holdings Co. (OH) to Marathon Oil Co. (OH)

Continued from Previous Page

Company: USS Holdings Company (OH).
Document #: SOS-046
Date: 11/18/1981
Document: Articles of Incorporation
Comment: USS Holdings Company was incorporated in Ohio.

Company: United States Steel Corporation
Document #: SOS-045
Date: 01/01/1966
Document: Application for License
Comment: Company authorized to do business in Ohio as a foreign entity.

Company: United States Steel Corporation
Document #: SOS-045
Date: 09/16/1964
Document: Statement of Good Standing
Comment: Company incorporated in DE on 09/16/1964.

Company: The Ohio Oil Company (OH)
Document #: SOS-018
Date: 06/04/1962
Document: Certificate of Amendment to Amended Articles of Incorporation
Comment: The Ohio Oil Co. (OH) changed its name to Marathon Oil Company (OH).

Company: Marathon Oil Company (WV)
Document #: TITLE-023
Date: 9/10/1936
Document: Assignment
Comment: Dissolution of Marathon Oil Co. (WV) on 07/31/1936 with all assets transferred to The Ohio Oil Co. (OH), sole shareholder (WV) was noted in the title document.

Company: The Ohio Oil Company (OH)
Document #: SOS-043
Date: 07/30/1936
Document: OK SOS Entity Summary Information
Comment: Company qualified to do business in OK as a foreign entity.

Company: Marathon Oil Company (WV)
Document #: TITLE-023
Date: 08/08/1934
Document: Assignment
Comment: Name change from Mid-Kansas Oil and Gas Co. (WV) noted in title document.

Company: Mid-Kansas Oil and Gas Company (WV)
Document #: SOS-044
Date: 12/29/1915
Document: Articles of Incorporation
Comment: Principle office located in Ohio.

Company: The Ohio Oil Company (OH)
Document #: SOS-017
Date: 07/30/1887
Document: Articles of Incorporation

3.6 Sun Pipe Line Company

SUN PIPE LINE COMPANY

(Successor to OMR Pipeline and Sun Pipe Line Company (PA))

PRP Class: Past Operator
Status: Active
Period of Activity: 1967 – 1972 (OMR Pipeline Company)
1972 – 1992 (Sun Pipe Line Company (PA))
Current Contact: Lindsay A. Brown
Archer & Greiner P.C.
For Sun Pipe Line Company
One Centennial Square
Haddonfield, NJ 08033
(856) 795-2121 (104E-002, SEMS-06_713770)

1. How this corporate entity is tied to the site

Between 1967 and 1992, OMR Pipe Line Company and its successor Sun Pipe Line Company (PA), had right of way interests in Parcels 1, 4, 7, 8, 9, 10, 11, 12, 13 and 14 for the purpose of installing, operating, and maintaining pipelines on the site (TITLE-001; TITLE-002; TITLE-003; TITLE-004; TITLE-012; TITLE-013).

Sun Pipe Line Company, a subsidiary of Sunoco, Inc., is currently an active entity (SEC-002; SOS-0026).

2. Contaminated parcels tied to PRP

Sampling results reported in the 2011 Expanded Site Inspection Report identify site locations contaminated with hazardous substances (SEMS-06_643609). The table below groups the impacted parcels that contain contamination by functional area (column 2) and lists the impacted parcels that OMR Pipe Line Company and Sun Pipe Line Company (PA) operated on (column 3).

Functional Area	Parcels Impacted	Impacted Parcels Tied to OMR Pipe Line Company
Refined product storage	2, 3, 8, 10, 11, 12, 13, 14, 16	8, 10, 11, 12, 13, 14
Processing Area	8, 10	8, 10
Crude oil storage	4, 5, 6, 7, 8, 11, 12	4, 7, 8, 11, 12

3. Ownership/Operation chronology

Date	Event	Reference No.
2/7/1967	Sunray DX Oil Company conveyed Right-of-Way Easements associated with Parcels 4, 7, 8, 10, 11 and 12 to the OMR Pipe Line Company by way of General Warranty Deed.	TITLE-001
8/8/1968	Wendell O. List and Mignon S. List conveyed Parcels 13 and 14 to the OMR Pipe Line Company through a Right of Way Grant for the "right to locate, construct, lay, install, operate, inspect, maintain, repair, change the size of, replace and remove, in whole or in part, a pipe line or pipe lines for the transportation of oil, petroleum products, gas or water, or either, together with valves, fittings, pumps and similar appurtenances as may be necessary to the operation of said lines, with right to install and bury under the surface of the ground, to a depth of 24 inches, metallic anodes and other devices for the control of pipe line corrosion, over, through and upon."	TITLE-002
9/23/1969	Winey Harjo, Wesley Harjo, Barney Harjo, Vera Mason (formerly Harjo), Patsy Pressow (formerly Harjo), Wilson Harjo, and Effie Harjo (wife of Wilson Harjo), granted a Right of Way to the OMR Pipe Line Company that allowed "the right to locate, construct, lay, install, operate, inspect, maintain, repair, change the size of, replace and remove, in whole or in part, a pipe line or pipe lines for the transportation of oil, petroleum products, gas or water, or either, together with valves, fittings, pumps and similar appurtenances as may be necessary to the operation of said lines, with the right to install and bury under the surface of the ground, below plow depth, metallic anodes another other devices for the control of pipe line corrosion, over, through and upon" Parcels 13 and 14.	TITLE-003; TITLE-004
12/18/1992	The Sun Pipe Line Company assigned all of its conveyable rights, title and interests, including rights of way, easements, licenses, and permits for Parcels 1, 4, 7, 9, 10, 11, 12, 13 and 14 to the Sun Marine Terminals Company by way of an Assignment and Assumption of Rights of Way.	TITLE-012; TITLE-013

4. Corporate history with current name

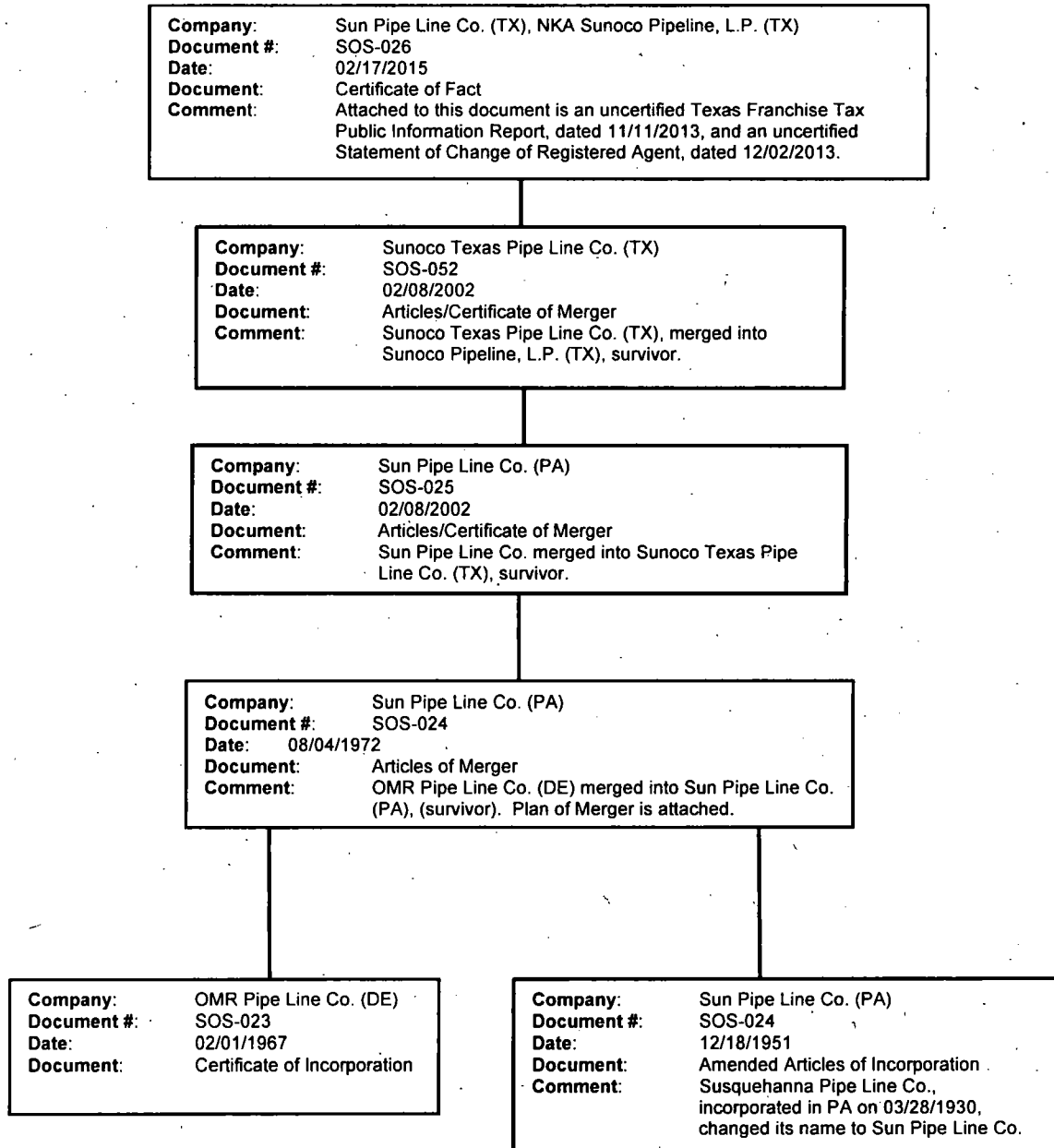
OMR Pipe Line Company		
2/1/1967	OMR Pipe Line Company was incorporated in Delaware.	SOS-023
8/4/1972	OMR Pipe Line Company (non-survivor) merged into the Sun Pipe Line Company (survivor), a Pennsylvania corporation.	SOS-024

2/8/2002	Sun Pipe Line Company (PA non-survivor) merged into the Sun Pipe Line Company (TX survivor). Sun Pipe Line Company (TX) is an active entity and a subsidiary of Sunoco, Inc.	SOS-025; SOS-026; SEC-002
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5. Defenses asserted by the PRP

Sun Pipe Line Company is unable to confirm responsibility for the conditions at the site (104E-002).

Sun Pipe Line Company (DE), Corporate Tree



3.7 Sunoco, Inc. (R&M)

SUNOCO, INC. (R&M)

(Successor to Sunray Oil Corporation, Oklahoma Mississippi River Products Line, Inc., Sunray DX Oil Company, and Sun Oil Company)

PRP Class:	Past Operator
Status:	Active
Period of Activity:	1946 – 1967
Current Contact:	Lindsay A. Brown Archer & Greiner P.C. For Sunoco, Inc. (R&M) One Centennial Square Haddonfield, NJ 08033 (856) 795-2121 (104E-002, SEMS-06_713770)

1. How this corporate entity is tied to the site

Between 1946 and 1967, Sunray Oil Corporation and its successors had right of way interests in Parcels 1, 4, 7, 8, 9, 10, 11, 12, 13 and 14 for the purpose of installing, operating, and maintaining pipelines on the site (TITLE-001; TITLE-027; TITLE-028 TITLE-030). The pipelines were used for the transport of oil and oil products during the time refinery operations occurred on the site property.

In addition to the pipelines, a 1961 Sanborn map showed a Sunray Oil Corp. pumping station present on the site property (OPS-010).

The current successor of Sunray Oil Corporation is Sunoco, Inc. (R&M). Sunoco, Inc. (R&M) is a subsidiary of Sunoco, Inc., and is an active entity (SEC-002; SOS-030).

2. Contaminated parcels tied to PRP

Sampling results reported in the 2011 Expanded Site Inspection Report identify site locations contaminated with hazardous substances (SEMS-06_643609). The table below groups the impacted parcels that contain contamination by functional area (column 2) and lists the impacted parcels that Sunray Oil Corporation and its successors operated on (column 3).

Functional Area	Parcels Impacted	Impacted Parcels Tied to
		Sunray Oil Corporation
Refined product storage	2, 3, 8, 10, 11, 12, 13, 14, 16	8, 10, 11, 12, 13, 14
Processing Area	8, 10	8, 10
Crude oil storage	4, 5, 6, 7, 8, 11, 12	4, 7, 8, 11, 12

3. Ownership/Operation chronology

Date	Event	Reference No.
12/27/1946	The Wilcox Oil Company granted rights of way to the Sunray Oil Corporation via Parcels 4, 7, 8, 10, 11 and 12. The Right of Way Agreement granted the Sunray Oil Corporation "the right to lay, maintain, operate, re-lay and remove at any time a pipe line or pipe lines for the transportation of oil or oil products, gas and water, and if necessary, to construct, maintain, operate and remove telegraph and telephone lines, with right of ingress and egress to and from the same, on over and through" the aforementioned parcels.	TITLE-027
2/15/1949	Sunray Oil Corporation granted right, title, and interest of the right of way grants associated with Parcels 4, 7, 8, 10, 11 and 12. Nine-tenths interest was conveyed to Sunray Pipe Line Co. and one-tenth interest was conveyed to the Wilcox Oil Company.	TITLE-028
12/30/1953	Sunray Pipe Line Co. assigned all of the right, title and interest in Parcels 4, 7, 8, 10, 11 and 12, by way of an Assignment of Rights of Way, to the Oklahoma Mississippi River Products Line, Inc., a company succeeded by the Sunray DX Oil Company.	TITLE-001; TITLE-030
2/7/1967	Sunray DX Oil Company conveyed Right-of-Way Easements associated with Parcels 4, 7, 8, 10, 11 and 12 to the OMR Pipe Line Company by way of General Warranty Deed.	TITLE-001

4. Corporate history with current name

Sunray DX Oil Company		
6/6/1930	The Sunray DX Oil Company was incorporated in Delaware.	SOS-027
10/18/1953	The Sunray Oil Corporation merged into the Sunray DX Oil Company.	SOS-040
2/7/1967	The Oklahoma Mississippi River Products Line, Inc., merged into the Sunray DX Oil Company.	SOS-041

10/25/1968	The Sunray DX Oil Company (non-survivor) merged into the Sun Oil Company (survivor).	SOS-028
9/30/1971	The Sun Oil Company (non-survivor) merged into Sunoco, Inc. (R&M) (survivor) (SOS-029). Sunoco, Inc. (R&M) is an active entity and a subsidiary of Sunoco, Inc.	SOS-030; SEC-002

5. Defenses asserted by the PRP

Sunoco, Inc. (R&M) is unable to confirm responsibility for the conditions at the site (104E-002).

Sunoco, Inc. (R&M) Corporate Tree

Company: Sunoco, Inc. (R&M)
Document #: SOS-030; SOS-054; SEC-002
Date: 02/13/2015
Document: Certificate of Good Standing
Comment: Sunoco, Inc. (R&M), current name of Sun Oil Company of Pennsylvania, is in good standing with the state of Pennsylvania and a subsidiary of Sunoco, Inc.

Company: Sun Oil Company of Pennsylvania (PA)
Document #: SOS-029
Date: 09/30/1971
Document: Articles of Merger with attached Plan of Merger
Comment: Sun Oil Company (NJ) merged into Sun Oil Company of Pennsylvania, survivor

Company: Sun Oil Co. (NJ)
Document #: SOS-028
Date: 10/25/1968
Document: Joint Agreement and Plan of Merger
Comment: Sunray DX Oil Co. merged into Sun Oil Co., survivor.

Company: Sunray DX Oil Co. (DE)
Document #: SOS-041
Date: 02/07/1967
Document: Certificate of Ownership and Merger
Comment: Oklahoma Mississippi River Products Line, Inc. (DE) merged into Sunray DX Oil Co., the survivor.

Company: Sunray DX Oil Co. (DE)
Document #: SOS-040 (only certifiable document available from DE SOS)
Date: 10/18/1953
Document: Merger
Comment: Sunray Oil Corporation (DE) merged into Sunray DX Oil Co., the survivor.

Company: Sunray DX Oil Co. (DE)
Document #: SOS-027 (only certifiable document available from DE SOS); SOS-053
Date: 06/06/1930
Document: Certificate of Incorporation
Comment: Sunray DX Oil Co. was incorporated in Delaware.

4.0 SUMMARY, CONCLUSIONS AND RECOMMENDATIONS

4.1 Summary

The Wilcox Oil site, a consolidation of two adjacent inactive petroleum refineries, is located on the east side of the Town of Bristow in Creek County, Oklahoma. Oil refinery and storage operations took place at the site from about 1915 to the late 1960s.

In depth corporate research has been conducted on four entities in order to demonstrate both their connection to the site as a PRP and to identify a current and viable successor. The research resulted in the need for seven corporate summaries to fully address EPA's original tasking that named four companies. The summaries prepared for the seven companies include the evidence linking the company to the site as a PRP, the continuous corporate history to the currently viable successor, and current contact information for that entity.

Toeroek has also collected certified copies of the EPA-designated title, court and corporate records. The paper copies were delivered as a part of this report along with the attached tables, corporate summaries, corporate trees, and reference list.

4.2 Conclusions

The four company names provided by EPA, all of which provided a response to the Special Notice Letters sent in July 2014, have viable successor corporations.

4.3 Recommendations

Upon completing the enhanced corporate research, the following recommendation is added:

- Information Request letters be sent to the identified parties with very specific questions, based on the additional information gleaned during the preparation of the corporate history report with the intent being to infill gaps for the viable parties.

Table 1
CERTIFIED TITLE DOCUMENTS

Ref. No.	Affected Parcels	Co. Name on Document	Successor Name	Document Name	Date Recorded	Bk/Pg	Doc. #
TITLE-001	4, 7, 8, 10, 11, 12	Sunray DX Oil Co.	Sunoco, Inc. (R&M)	General Warranty Deed	5/24/1967	1026/172-177	673123
TITLE-002	13, 14	OMR Pipe Line Co.	Sunoco, Inc. (R&M)	Right of Way Grant	9/13/1968	1054/165-166	685481
TITLE-003	13, 14	OMR Pipe Line Co.	Sunoco, Inc. (R&M)	Right of Way Grant	11/3/1969	1077/631-634	696999
TITLE-004	13, 14	OMR Pipe Line Co.	Sunoco, Inc. (R&M)	Right of Way Grant	11/3/1969	1077/635-639	697000
TITLE-005	4, 5, 6, 7, 8, 10, 11, 12	The Standard Oil Co.	BP Corporation North America, Inc.	Tanksite Lease	11/19/1915	118/216	22032
TITLE-006	4, 5, 7, 8, 10, 11, 12	Standard Oil Co.	BP Corporation North America, Inc.	Tanksite Lease	11/19/1915	118/217	22033
TITLE-007	5, 6	The Standard Oil Co.	BP Corporation North America, Inc.	Tanksite Lease	11/19/1915	119/69	22031
TITLE-008	8, 9, 10, 11, 12	St. Louis - San Francisco Railway Co.	BNSF Railway Co.	Deed	4/6/1917	146/347	39643
TITLE-009	1, 16	St. Louis - San Francisco Railway Co.	BNSF Railway Co.	Deed of Easement	4/6/1917	151/116	36942
TITLE-010	5, 6	Sinclair Pipe Line Co.	BP Corporation North America, Inc.	Right of Way Agreement	5/10/1921	228/344	86221
TITLE-011	13, 15	Transcontinental Oil Co.	Marathon Oil Co.	Right of Way Grant	9/2/1922	259/142	101350
TITLE-012	4, 7, 10, 11, 12, 13, 14	Sun Pipe Line Co.	Sunoco, Inc. (R&M)	Assignment and Assumption of Rights of Way	6/3/1993	307/1233-1241	937247
TITLE-013	1, 9	Sun Pipe Line Co.	Sunoco, Inc. (R&M)	Assignment and Assumption of Rights of Way	12/10/1993	316/781- 792	9316558
TITLE-014	15	Transcontinental Oil Co.	Marathon Oil Co.	Assignment	8/23/1926	331/627	18484
TITLE-015	15	Transcontinental Oil Co.	Marathon Oil Co.	Right of Way	8/15/1927	351/528	28992
TITLE-016	8, 10, 11, 12	Transcontinental Oil Co.	Marathon Oil Co.	Agreement	2/6/1928	360/63	33185

Table 1
CERTIFIED TITLE DOCUMENTS

Ref. No.	Affected Parcels	Co. Name on Document	Successor Name	Document Name	Date Recorded	Bk/Pg	Doc. #
TITLE-017	7, 8, 11, 12	Sinclair Oil and Gas Co.	BP Corporation North America, Inc.	Special Warranty Deed	12/14/1929	376/346	48600
TITLE-018	8, 10, 11, 12, 15	Transcontinental Oil Co. & Mid-Kansas Oil and Gas Co.	Marathon Oil Co.	Assignment of Leases	9/2/1930	393/368	53839
TITLE-019	8, 10, 11, 12, 15	Mid-Kansas Oil & Gas Co.	Marathon Oil Co.	Assignment of Lease	4/22/1932	409/504	6802
TITLE-020	1, 9	The Burlington Northern and Santa Fe Railway Co.	BNSF Railway Co.	Quit Claim Deed	10/13/1999	412/1530-1554	9914252
TITLE-021	8, 10, 11, 12	Marathon Oil Co.	Marathon Oil Co.	Assignment of Lease	10/30/1935	435/198	23517
TITLE-022	10	The Ohio Oil Co.	Marathon Oil Co.	Partial Release of Lease	8/9/1937	444/349	31392
TITLE-023	8, 10, 11, 12	Marathon Oil Co. & Ohio Oil Co.	Marathon Oil Co.	Assignment of Lease	5/28/1937	445/76	30430
TITLE-024	5, 6, 7	Sinclair Refining Co.	BP Corporation North America, Inc.	Right of Way	1/26/1938	450/56	33624
TITLE-025	8, 10, 11, 12	The Ohio Oil Co.	Marathon Oil Co.	Assignment of Lease Agreement	3/14/1939	462/104	39286
TITLE-026	5, 6	Sinclair Refining Co.	BP Corporation North America, Inc.	Release of Right of Way Contracts	4/15/1943	495/556	63563
TITLE-027	4, 7, 8, 10, 11, 12	Sunray Oil Corporation	Sunoco, Inc. (R&M)	Right of Way Agreement	2/17/1947	538/415-416	90259
TITLE-028	4, 7, 8, 10, 11, 12	Sunray Oil Corporation & Sunray Pipe Line Co.	Sunoco, Inc. (R&M)	Assignment and Assumption of Rights of Way	6/18/1949	580/357	106138
TITLE-029	5, 6	Sinclair Pipe Line Co.	BP Corporation North America, Inc.	Certified Resolution of Board of Directors	5/31/1950	600/102	113867

Table 1
CERTIFIED TITLE DOCUMENTS

Ref. No.	Affected Parcels	Co. Name on Document	Successor Name	Document Name	Date Recorded	Bk/Pg	Doc. #
TITLE-030	4, 7, 8, 10, 11, 12	Sunray Pipe Line Co.	Sunoco, Inc. (R&M)	Assignment of Rights of Way	1/13/1954	694/280-288	54397
TITLE-031	1, 9	St. Louis - San Francisco Railway Co.	BNSF Railway Co.	Certificate	10/16/1963	942/425-431A	639896
TITLE-032	4, 5, 6, 7	Ohio Oil Co., Standard Oil Co. & Marathon Oil Co.	BP Corporation North America, Inc. & Marathon Oil Co.	Petition (with related documents)	12/11/1963	Case 33576	NA

Table 2
CERTIFIED CORPORATE DOCUMENTS

Ref. No.	Co. Name(s) on Document	Successor Name	Document Name	Date	Document Source	Total Pages	Notes
SEC-001	BNSF Railway Co.	BNSF Railway Co.	U.S. Securities and Exchange Commission Form 10-Q	11/07/2014	U.S. Securities and Exchange Commission	26	2013 10-K Annual Report for BNSF Railway Co
SEC-002	Sunoco, Inc.	Sunoco, Inc. (R&M)	U.S. Securities and Exchange Commission 2011 10-K Annual Report with Exhibit 21: Subsidiaries	12/31/2011	U.S. Securities and Exchange Commission	113	2011 10-K Annual Report, including Exhibit 21 (subsidiary names of Sunoco, Inc., including Sunoco, Inc. (R&M))
SEC-003	BP, p.l.c.	BP Corporation North America, Inc.	U.S. Securities and Exchange Commission 2013 Form 20-F	03/06/2014	U.S. Securities and Exchange Commission	308	Atlantic Richfield is wholly owned subsidiary of BP.
SEC-004	Marathon Oil Corporation	Marathon Oil Co.	U.S. Securities and Exchange Commission 2012 10-K Annual Report	02/02/2013	U.S. Securities and Exchange Commission website	211	Marathon Oil Co. formerly part of Marathon Oil Corporation; reference includes some exhibits.
SOS-001	St. Louis-San Francisco Railway Co.	BNSF Railway Co.	Articles of Association of St. Louis-San Francisco Railway Co.	08/24/1916	Missouri Secretary of State	12	
SOS-002	St. Louis-San Francisco Railway Co.; Burlington Northern, Inc.	BNSF Railway Co.	Articles of Merger	11/24/1980	Missouri Secretary of State	28	Articles of Merger of St. Louis-San Francisco Railway Co. into Burlington Northern Inc. (survivor). Articles of Association for St. Louis-San Francisco Railway Co. (dated 08/24/1916) attached.
SOS-003	Burlington Northern Railroad Co.; Burlington Northern Transportation Co.	BNSF Railway Co.	Merger	05/14/1981	Delaware Secretary of State	2	Survivor is Burlington Northern Railroad Co.

Table 2
CERTIFIED CORPORATE DOCUMENTS

Ref. No.	Co. Name(s) on Document	Successor Name	Document Name	Date	Document Source	Total Pages	Notes
SOS-004	Burlington Northern Railroad Co.; Atchison Topeka and Santa Fe Railway Co.	BNSF Railway Co.	Certificate of Merger with Restated Certificate of Incorporation of The Burlington Northern and Santa Fe Railway Co.	12/30/1996	Delaware Secretary of State	5	Survivor's new name is The Burlington Northern and Santa Fe Railway Co.
SOS-005	The Burlington Northern and Santa Fe Railway Co.	BNSF Railway Co.	Name Change	1/20/2005	Delaware Secretary of State	4	New name is BNSF Railway Co.
SOS-006	Standard Oil Co.	BP Corporation North America, Inc.	Certificate of Incorporation	6/18/1889	Indiana Secretary of State	3	Articles of Incorporation of Standard Oil Co.
SOS-007	Standard Oil Co.; Amoco Corporation	BP Corporation North America, Inc.	Certificate of Amended Articles of Incorporation	04/23/1985	Indiana Secretary of State	11	Name change from Standard Oil Co. to Amoco Corporation
SOS-008	Eagle Holdings, Inc. (IN); Amoco Corporation (IN); The British Petroleum Co., p.l.c. (English public limited company)	BP Corporation North America, Inc.	Certificate of Merger & Articles of Merger	12/31/1998	Indiana Secretary of State	36	Eagle Holdings, Inc. merged into Amoco Corporation, survivor; non-survivor was a wholly owned subsidiary of The British Petroleum Co., P.L.C. Attached Agreement and Plan of Merger announced parties' intention to combine their businesses as BP Amoco P.L.C.

Table 2
CERTIFIED CORPORATE DOCUMENTS

Wilcox Oil Superfund Site
March 16, 2015

Ref. No.	Co. Name(s) on Document	Successor Name	Document Name	Date	Document Source	Total Pages	Notes
SOS-009	BP Amoco Corporation; BP Corporation North America Inc.	BP Corporation North America, Inc.	Certificate of Amendment	05/01/2001	Indiana Secretary of State	3	Name change from BP Amoco Corporation to BP Corporation North America, Inc. Date of incorporation given as 06/18/1889; therefore successor to Standard Oil Co.
SOS-010	BP Corporation North America, Inc.	BP Corporation North America, Inc.	Certificate of Existence	01/14/2015	Indiana Secretary of State	1	BP Corporation North America, Inc. has current standing. Uncertified list of current officers attached to confirm company active as of the date of submittal.
SOS-011	Sinclair-Cudahy Oil and Gas Co.	BP Corporation North America, Inc.	Certificate of Organization of a Corporation under General Law	04/25/1916	Maine Secretary of State	7	Certificate also includes SOS-032, SOS-033, SOS-034, SOS-036.
SOS-012	Sinclair Oil and Gas Co. (ME); Sinclair Prairie Oil Co. (ME)	BP Corporation North America, Inc.	Certificate of Change of Name	03/31/1932	Maine Secretary of State	11	Name change to Sinclair Prairie Oil Co. (surviving name); 1916 Certificate of Organization of a Corporation under General Law attached.
SOS-013	Sinclair Prairie Co (ME); Wyoming Oil Co. (DE); Repollo Oil Co. WY)	BP Corporation North America, Inc.	Agreement of Consolidation and Merger and Amended Certificate of Organization	05/03/1949	Maine Secretary of State	27	Sinclair Prairie Oil Co., Wyoming Oil Co. and Repollo Oil Co. consolidated and merged into Sinclair Prairie Oil Co. (survivor); survivor then changed its name to Sinclair Oil & Gas Co.

Table 2
CERTIFIED CORPORATE DOCUMENTS

Ref. No.	Co. Name(s) on Document	Successor Name	Document Name	Date	Document Source	Total Pages	Notes
SOS-014	Sinclair Refining Co. (ME), FKA Cudahy Refining Co.; Sinclair Oil and Gas Co. (ME); Sinclair Oil Corporation (NY), FKA Sinclair Consolidated Oil Corporation; Sinclair Oil & Gas Co. (NY)	BP Corporation North America, Inc.	Plan of Liquidation by Merger and Agreement of Merger	09/30/1968	Maine Secretary of State	11	Sinclair Refining Co. and Sinclair Oil and Gas Co. merged into Sinclair Oil Corporation (survivor) with survivor's name changed to Sinclair Oil & Gas Co. Certification also covers SOS-035, SOS-041.
SOS-015	Sinclair Oil Corporation and Atlantic Richfield Co.	BP Corporation North America, Inc.	Certificate of Merger with Articles and Plan of Merger	03/04/1969	Pennsylvania Secretary of State	45	Sinclair Oil Corporation (PA) merged into Atlantic Richfield Co. (PA), survivor. Amended Articles of Incorporation attached (23 pp.)
SOS-016	Atlantic Richfield Co. (PA); Atlantic Richfield Delaware Corporation (DE)	BP Corporation North America, Inc.	Certificate of Merger with Name Change and Agreement and Plan of Merger	05/07/1985	Pennsylvania Secretary of State	37	Atlantic Richfield Co. merged into Atlantic Richfield Delaware Corporation, survivor, with survivor name change to Atlantic Richfield Co. Undated Certificate of Incorporation of survivor attached.
SOS-017	The Ohio Oil Co.	Marathon Oil Co.	Articles of Incorporation	8/1/1887	Ohio Secretary of State	3	Articles of Incorporation for The Ohio Oil Co.
SOS-018	The Ohio Oil Co.; Marathon Oil Co.	Marathon Oil Co.	Articles of Incorporation Amendment	08/1/1962	Ohio Secretary of State	2	Name change from The Ohio Oil Co. to Marathon Oil Co.

Table 2
CERTIFIED CORPORATE DOCUMENTS

Wilcox Oil Superfund Site
March 16, 2015

Ref. No.	Co. Name(s) on Document	Successor Name	Document Name	Date	Document Source	Total Pages	Notes
SOS-019	Marathon Oil Co.	Marathon Oil Co.	Agreement of Merger/Name Change	7/9/1982	Ohio Secretary of State	Unknown	Name change from Marathon Oil Co. to Marathon Petroleum Co.
SOS-020	Marathon Petroleum Co. (OH); TXO Production Corporation (DE); Marathon Oil Co. (DE)	Marathon Oil Co.	Ohio Certificate of Merger and Agreement of Merger	12/20/1990	Ohio Secretary of State	8	Marathon Petroleum Co. and TXO Production Corporation merged into Marathon Oil Co. USX Corporation owned 98% of survivor.
SOS-021	Transcontinental Oil Co.	Sunoco, Inc. (R&M)	Certificate of Incorporation	6/28/1919	Delaware Secretary of State	8	Company's objective are related to petroleum.
SOS-022	Transcontinental Oil Co.	Sunoco, Inc. (R&M)	Certificate with Consent to Dissolution	08/15/1930	Delaware Secretary of State	5	Documentation related to the dissolution of Transcontinental Oil Co.
SOS-023	OMR Pipe Line Co.	Sunoco, Inc. (R&M)	Articles of Incorporation	02/01/1967	Delaware Secretary of State	15	Articles of Incorporation for OMR Pipe Line Co.
SOS-024	OMR Pipe Line Co. (DE); Sun Pipe Line Co. (PA)	Sunoco, Inc. (R&M)	Articles of Plan of Merger and Certificate of Merger	08/04/1972	Pennsylvania Secretary of State	22	OMR Pipe Line Co. (non-survivor) merged into Sun Pipe Line Co. (survivor). Articles of Incorporation of Sun Pipe Line Co., dated 12/18/1951 attached.
SOS-025	Sun Pipe Line Co. (PA); Sun TX Pipe Line Co. (TX)	Sunoco, Inc. (R&M)	Merger	02/08/2002	Pennsylvania Secretary of State	4	Merger between Sun Pipe Line Co. (PA), non-survivor, and Sun TX Pipe Line Co. (TX), survivor.
SOS-026	Sun Pipe Line Co. (TX)	Sunoco, Inc. (R&M)	Certificate of Fact	02/17/2015	Texas Secretary of State	3	Sun Pipe Line Co. in Good Standing in TX. Uncertified copy of latest Franchise Tax Public Interest Report also attached.

Table 2
CERTIFIED CORPORATE DOCUMENTS

Ref. No.	Co. Name(s) on Document	Successor Name	Document Name	Date	Document Source	Total Pages	Notes
SOS-027	Sunray Oil Corporation; Homaokla Oil Co.	Sunoco, Inc. (R&M)	Articles of Merger and Consolidation	08/06/1930	Delaware Secretary of State	32	Per Delaware secretary of State personnel, this archaic style document met the request for articles of Incorporation for Sunray DX Oil Co.
SOS-028	Sunray DX Oil Co; Sun Oil Co. (NJ)	Sunoco, Inc. (R&M)	Articles of Merger	10/25/1968	Delaware Secretary of State	49	Sunray DX Oil Co. merged into Sun Oil Co. (NJ), survivor
SOS-029	Sun Oil Co. (NJ); Sun Oil Co. of Pennsylvania (PA)	Sunoco, Inc. (R&M)	Articles, Plan and Certificate of Merger	09/30/1971	Pennsylvania Secretary of State	7	Sun Oil Co. merged into Sun Oil Co. of Pennsylvania, survivor.
SOS-030	Sunoco, Inc. (R&M)	Sunoco, Inc. (R&M)	Certificate of Good Standing	02/13/2015	Pennsylvania Secretary of State	1	Good Standing for Sunoco, Inc. (R&M) in Pennsylvania
SOS-031	Sinclair Cudahy Pipe Line Co.	BP Corporation North America, Inc.	Certificate of Organization of a Corporation under General Law	04/25/1916	Maine Secretary of State	7	Sinclair Cudahy Pipe Line Co. incorporated
SOS-032	Service Pipe Line Co. (ME); American Oil Pipe Line Co. (DE)	BP Corporation North America, Inc.	Agreement of Merger	01/29/1957	Maine Secretary of State	15	American Oil Pipe Line Co. merged into Service Pipe Line Co., survivor; Certificate also includes SOS-031, SOS-033, SOS-034, SOS-036, SOS-037.

Table 2
CERTIFIED CORPORATE DOCUMENTS

Wilcox Oil Superfund Site
March 16, 2015

Ref. No.	Co. Name(s) on Document	Successor Name	Document Name	Date	Document Source	Total Pages	Notes
SOS-033	Amoco Pipeline Co. (ME); Transitory Pipeline Co. (DE)	BP Corporation North America, Inc.	Articles and Plan of Merger	03/29/2001	Maine Secretary of State	4	Transitory Pipeline Co. merged into Amoco Pipeline Co., survivor. D.B. Pinkertt signed for both companies as Vice-President. Certificate also includes SOS-031, SOS-032, SOS-034, SOS-036, SOS-037.
SOS-034	BP Pipelines (North America), Inc.; Amoco Pipeline Co.	BP Corporation North America, Inc.	Articles of Amendment	04/02/2001	Maine Secretary of State	3	Amoco Pipeline Co. changed its name to BP Pipelines (North America), Inc. Certificate also includes SOS-031, SOS-032, SOS-033, SOS-036, SOS-37.
SOS-035	The Cudahy Refining Co.	BP Corporation North America, Inc.	Certificate of Organization of a Corporation under General Law	10/20/1908	Maine Secretary of State	4	Certification also covers SOS-014, SOS-042.
SOS-036	Service Pipeline Co.; Amoco Pipeline Co.	BP Corporation North America, Inc.	Certificate of Change of Name	04/01/1970	Maine Secretary of State	2	Service Pipeline Co. changed its name to Amoco Pipeline Co. Certificate also includes SOS-031, SOS-032, SOS-033, SOS-034, SOS-037.
SOS-037	BP Pipelines (North America) Inc.	BP Corporation North America, Inc.	2014 Annual Report	01/14/2015	Maine Secretary of State	2	BP Pipelines (North America) Inc. is in existence. Certificate also includes SOS-031, SOS-032, SOS-033, SOS-034.
SOS-038	Atlantic Richfield Co.	BP Corporation North America, Inc.	Certificate of Good Standing	01/14/2015	Delaware Secretary of State	1	

Table 2
CERTIFIED CORPORATE DOCUMENTS

Ref. No.	Co. Name(s) on Document	Successor Name	Document Name	Date	Document Source	Total Pages	Notes
SOS-039	BP Corporation North America, Inc.	BP Corporation North America, Inc.	Certificate of Existence	01/14/2015	Indiana Secretary of State	1	
SOS-040	Sunray Oil Corporation; Homaokla Oil Co.	Sunoco, Inc. (R&M)	Articles of Merger and Consolidation	08/06/1930	Delaware Secretary of State	40	Per Delaware secretary of State personnel, this archaic style document met the request for the 1971 Merger of Sun Oil Co. into Sunoco, Inc.
SOS-041	Oklahoma Mississippi River Product Lines, Inc.; Sunray DX Oil Co.	Sunoco, Inc. (R&M)	Articles of Merger	02/07/1967	Delaware Secretary of State	7	Oklahoma Mississippi River Product Lines, Inc. merged into Sunray DX Oil Co., survivor
SOS-042	The Cudahy Refining Co.; Sinclair Refining Co.	BP Corporation North America, Inc.	Certificate of Change	01/25/1917	Maine Secretary of State	2	Name Change from The Cudahy Refining Co. to Sinclair Refining Co. Certification also covers SOS-014, SOS-035.

Table 3
Operational History Research

Ref. No.	Topic	Resource	Source	Information Obtained & Comments
OPS-001	Site operations	Title documents	Creek County Clerks' office	Title documents sometimes include mention of site improvements conveyed with property, including "refinery," "tank site," etc.
OPS-002	Requested by EPA	Certified title documents	Creek County Clerks' office	Certified copies of requested documents, i.e., those cited in Title Search Report; ordered and received.
OPS-003	Requested by EPA	Certified court documents	District Court records	Certified copies of requested documents, i.e., those cited in Title Search Report; ordered and received.
OPS-004	Requested by EPA	Certified corporate documents	various state Secretary of State offices	Certified copies of requested documents, i.e., those which include an EPA-designated company or viable successor entity; ordered and received.
OPS-005	Current Ownership	Assessor records	Creek County Assessor's office	Per tax records, no changes in parcel ownership had occurred since title report submitted
OPS-006	Site operations	Historical aerial photographs	EDR	Aerial photographs dated 1972, 1980, 1984, 1995, 2005, 2006, 2008, 2010 ; Oil tanks & pits only visible on 1972.
OPS-007	Site operations	Historical aerial photographs	U.S. Geological Survey (USGS)	Received 1954 & 1972 of site area.
OPS-008	Site operations	Historical aerial photographs	Natural Resources Conservation Service (NRCS)	No additional relevant aerial photographs located.
OPS-009	Site operations	Historical topographic maps	EDR	Order resulted in topographic maps dated 1901, 1916, 1973; tank farm shown on 1916; others dated before and after site was active
OPS-010	Site operations	Sanborn maps	EDR	Order resulted in receipt of 1915, 1920, 1923, 1961 maps of site area, showing buildings, tanks and other features.
OPS-011	Site operations	Poor's Manual (Railroads); 1917; 1922	Chicago Public Library (in person research by Chicago office personnel)	No site relevant information for BNSF Railway Co. or its predecessor St. Louis-San Francisco Railroad Co.
OPS-012	Site operations	Historical city directories	EDR & Preliminary Assessment Report	EDR order resulted in response that no occupancy names were available. An attachment to a Preliminary Assessment Report include selected pages from Bristow directories dated 1926-1955, searched in person by EPA at the local library. Rural location of the site plus many of the parcels have no structures means unique street addresses were not available. Some companies are mentioned in directories, but locations are not specific enough to tie to the site.
OPS-013	Site operations	SEMS Region 6	On-line intranet	Some relevant information available, although reports not specific to this topic; therefore, references limited.
OPS-014	Site operations	USGS publications	internet searches	Did not locate useful materials

Table 3
Operational History Research

Ref. No.	Topic	Resource	Source	Information Obtained & Comments
OPS-015	Site operations	Local newspapers	Tulsa World	Archives not available on-line
OPS-016	Site operations	Local newspapers	Bristow Record	Archives not available on-line
OPS-017	Site operations	Trade magazines	The Refiner and Natural Gasoline Manufacturer	One article referenced in a report; no other volumes located.
OPS-018	Site operations	Trade magazines	Dallas Public Library	Researched Petroleum Refiner 1944 to 1961 (article titles and industry/business news section), as available; no useful information found.
OPS-019	Site operations	Trade magazines	Chicago Public Library (in person research by Chicago office personnel)	National Petroleum News researched; no useful information found
OPS-020	Site operations	Historical societies	OK Historical Society	Some newspapers on-line; only up to 1929; available for searching by single word; very slow; no information relevant to site located.
OPS-021	Site operations	State documents	Oil and Gas Conservation Division of the OK Corporation Commission	Email responses from two persons in the Oil and Gas Division. Corporation Commission does not regulate refineries; no records found.
OPS-022	Site operations	Historical societies	Bristow Historical Society	Unable to contact by phone; website not available.
OPS-023	Site operations	Moody's Manual of Investments 1922	Chicago Public Library (in person research by Chicago office personnel)	Included mention of Transcontinental Oil Company (p. 1417) operating a refinery at Bristow. Other Moody's Manual of Investments volumes (1930, 1940 & 1950) and Industrial Manual volumes (1964, 1966 & 1980) had no site-specific information.
OPS-024	Area Background	Library of Congress/USGS publications	Geology of the Bristow Quadrangle, Creek County, Oklahoma	Oil and gas information limited to drilling activities; no mention of refineries.
OPS-025	Site operations	Independent Oil Shares. 2nd Edition	Google Scholar	In 1919 there was a refinery at Bristow with an operating capacity of more than 2,500 barrels per day; the plant and property were valued at more than one million dollars.